

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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4     EVELYN CINTRON, :  
5                         Plaintiff :Civil Action No. 19-4078  
6                         : :  
7                         vs. : :  
8                         : :  
9     CITY OF PHILADELPHIA, et al., : :  
10                      Defendants : :  
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12                   Deposition of: Maureen Rush

13                   Taken by : Thomas O. Fitzpatrick, Esquire

14                   Before : Lisa L. Miller, RPR

15                   Date : Friday, November 3, 2023

16                   At : Zoom Videoconference

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## 10 INDEX TO EXHIBITS

11 (None.)

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<p>P R O C E E D I N G S (10:08 a.m.)</p> <p><b>STIPULATION</b></p> <p>It is hereby stipulated by and between counsel for the respective parties that signing, sealing, certification, and filing are hereby waived, and that all objections except as to the form of the question are reserved to the time of trial.</p> <p>MAUREEN RUSH, called as a witness, being duly sworn or affirmed, was examined and testified as follows:</p> <p><b>EXAMINATION</b></p> <p>BY ATTORNEY FITZPATRICK:</p> <p>Q. Good morning, Ms. Rush.</p> <p>A. Good morning.</p> <p>Q. Ms. Rush, my name is Thomas Fitzpatrick. I represent Ms. Evelyn Cintron, Lieutenant Evelyn Cintron in this case. And also on the phone -- on the call here is Attorney Isaac Green. And as you heard us say earlier, Ms. Cintron is on the video conference call and you're joined by your attorney, Mr. Golden, correct?</p> <p>A. That's correct.</p> <p>Q. Okay. And he's right there in the room next to you; is that right?</p> <p>A. He is right next to me, yes.</p> <p>Q. Okay. Ms. Rush, we're going to be taking your deposition this morning.</p>	<p>Page 4</p> <p>Q. Okay. And as of -- as of when did you retire?</p> <p>A. I stepped down as Vice President for Public Safety Chief of Police in the end of 2021, and then I -- in 2022, I remained working as a senior advisor to my previous boss, who is the senior executive vice president, through the end of 2022, and then I fully retired from Penn.</p> <p>Q. Okay. Now, as the VP of public safety, did you contemporaneous to that position hold a seat on the board of directors or board of grievances for the University of Pennsylvania?</p> <p>A. I'm sorry. On the -- on the board of the University of Pennsylvania?</p> <p>Q. Yes.</p> <p>A. No, I was not a member of the board of the University of Pennsylvania.</p> <p>Q. Okay. Did you hold any other positions simultaneous to your position as VP of Public Safety?</p> <p>A. Chief of Police.</p> <p>Q. Chief of Police.</p> <p>Okay. And who did you report to in that position?</p> <p>A. I reported to the Senior Executive Vice President Craig Carnaroli, C-a-r-n-a-r-o-l-i.</p>
<p>Now, have you ever been deposed before?</p> <p>A. I have.</p> <p>Q. Okay. Approximately how many times have you been deposed?</p> <p>A. Fifteen, give or take.</p> <p>Q. Okay. So I'm sure that you're quite familiar with kind of the ground rules of a deposition and that kind of thing.</p> <p>I'm not asking you to guess. If you can remember the things that I'm asking you about, great, please give us that information.</p> <p>You know you need to answer verbally so that your answers can be recorded, of course. And if at any point you need to take a break, I'm more than happy to allow you to do so. I just ask that if there's a question pending, you answer that question prior to taking that break. Is that okay?</p> <p>A. That's fine.</p> <p>Q. Okay. Now, Ms. Rush, are you -- are you currently employed by the University of Pennsylvania?</p> <p>A. I am not.</p> <p>Q. Okay. Are you retired?</p> <p>A. I am.</p>	<p>Page 5</p> <p>Q. Okay. Now, you kind of started at the end of your career and retirement, Ms. Rush. But, just briefly, why don't you tell us about yourself and how you came to become the Vice President of Public Safety and Chief of Police at the University of Pennsylvania.</p> <p>A. I will try to truncate 45 years for us all. So I started out my law enforcement career in 1976 as one of the first 100 women to work street patrol in the City of Philadelphia. I was assigned to the 25th District and then subsequently went up the ranks.</p> <p>I retired in 1994 as a lieutenant. I went over to the University of Pennsylvania. My first assignment there was Director of Victim Support and Special Services. That was '94 through '96.</p> <p>And in '96, I was appointed Chief of Police -- Chief of the Penn Police Department, the same Penn Police -- I worked closely with Philadelphia Police. I did that position through 2000.</p> <p>In 2000, I became the Interim Vice President for Public Safety and then appointed officially by the Board of Trustees in 2001 and then subsequently retired in 2021 from that position.</p> <p>Q. Okay. And you said that back in 1976, when you started with the Philadelphia Police Department, you</p>

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were one of the first 100 women to work as a police officer on foot patrol in Philadelphia in 1976; is that right?

A. That's correct.

Q. Okay. And so then I take it that in 1994, when you left the police department as a lieutenant, I take it that at that time there were relatively few women in leadership positions?

A. Where are you speaking about?

Q. Philadelphia Police Department by 1994.

A. Actually, there was a deputy commissioner when I was leaving and women had started to be in higher ranks in a decent number, so -- and many more women were hired. I don't know the exact number, but somewhere around 1500 or more, and many of those women were now at the rank of sergeant or above.

Q. Okay. You specifically recall at least one deputy commissioner back then?

A. Yes, I do.

Q. Now, at what point did you become involved with the Police Athletic League?

A. I believe I came on the board in 2000.

Q. Okay. And how did you -- how did you become a member of the Police Athlete League Board? Does Penn

have an affiliation with the Police Athlete League?

A. No. My -- my previous boss who was the vice president of public safety was -- held a position on the board and when he retired I was asked to assume that position.

Q. Okay. And what was his name, your previous boss?

A. Tom Seamon, S-e-a-m-o-n.

Q. Okay. And this is your previous boss at the University of Pennsylvania?

A. That's correct.

Q. Okay. And so you were asked to come onto the board at the Police Athletic League and that's around 2000, you said?

A. Yes.

Q. Okay. And are you a member of any committees at that time?

A. I became a member of the Executive Board and Finance Board. I don't recall the exact timing of it.

Q. Okay. Well, let me ask you this: Are you still active with the Police Athletic League Board?

A. I am.

Q. Okay. And what are your current committee positions?

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A. I'm on the executive board and I'm on the finance board and --

Q. Okay.

A. -- I believe I'm still on the nominations board as well.

Q. Okay. And so, Ms. Rush, although you can't recall exactly when you took on those committee assignments, is it safe to say that once you took those assignments on you remained a part of those committees until this present moment?

A. Yes.

Q. Okay. And back in 2016 and 2017 -- we could say '16 through '19 -- were you part of those committees?

A. Yes.

Q. Okay. Now, what are some of your duties as it relates to the Executive Board Committee?

A. You know, it's pretty standard for most boards you're involved in in a way that you're going to do development work, raise money for the board, for the Police Athletic League, ensure that we're just making sure -- make sure, you know, the budget's good. So, you know, it's a standard executive board meeting.

I was -- I was a member. I was not -- I was

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never president or chair of the board. So, you know, it was just making sure of the strategic direction and financial solvency of the board and to be a representative in the community to help raise money at various events.

Q. So then are you telling me that you -- you didn't have any specific responsibilities related to interactions with the Philadelphia Police Department and PAL; is that right?

A. Well, no. I mean, it kind of goes hand in hand. The Police Athletic League has a commanding officer of the police. And at the time we had -- we currently have an executive director. And in the years that you're talking about, we had an executive director. And so there's a lot of interaction with the Philadelphia Police both in PAL but also in my role at Penn.

Q. Okay. Well, I want to limit it to PAL at this point. And the executive director during those years, was that Ted Quali?

A. Ted Quali, yes.

Q. Okay. And so when I'm asking you about your duties as a member of the Executive Committee, just so that we're clear, what I'm asking you is, did you have

	Page 12		Page 14
1	any specific assignments such as liaison to the police	1	becomes a commander at PAL; yes?
2	department or liaison to a particular PAL center or	2	A. She becomes the commanding officer of the
3	anything of that nature?	3	police PAL officers, yes.
4	I understand that all Board members have	4	Q. Okay. And just so that we're clear -- I think
5	general responsibilities, but did you have any specific	5	we understand the structure from prior deposition
6	duties as it related to your interaction with the police	6	testimony. But I'll certainly give you the opportunity
7	representatives?	7	to explain the structure of the PAL relationship to the
8	A. No.	8	police department and that partnership. So why don't
9	Q. Okay. Now, that was for the Executive Board	9	you tell us about that.
10	Committee.	10	A. So the police department and the -- and the
11	Did you have any such duties as it related to	11	employees of the police department, the police officers,
12	your efforts on the Finance Committee?	12	the commanding officer, who was, again, a sworn officer,
13	A. No.	13	in this case lieutenant, is different than the civilian
14	Q. Okay. And what about the Nomination Committee?	14	employees who are working for the board which is a
15	A. No.	15	501(c)(3), and that -- there is -- the police commander
16	Q. Okay. Now, do recall at some point the PAL	16	oversees the police officers who are assigned to the PAL
17	Board having an interview or a meeting with Ms. Evelyn	17	detail. And that's what these officers do every day.
18	Cintron regarding her becoming the police commander for	18	It's a full -- they are transferred into PAL. That
19	the police side of the Police Athletic League?	19	commanding officer is their commanding officer for all
20	A. Yes.	20	aspects of their duties.
21	Q. Okay. Do you recall when that was?	21	The executive director reports to the board of
22	A. I don't.	22	directors and is responsible for the strategic mission,
23	Q. Okay. And do you recall most of the PAL board	23	you know, employment of all the civilian staff.
24	members being present for that meeting?	24	The police commander does not report to the
	Page 13		Page 15
1	A. No.	1	board but reports inside the Philadelphia Police
2	Q. Okay. Who do you recall being present for that	2	Department, so whoever the commissioner designated.
3	meeting?	3	Q. Okay. And let me ask you this: During your
4	A. I recall Ron Rabena, Bernie Prazenica. I don't	4	time as a police officer, did you have any involvement
5	remember if there was anyone else there. Those are the	5	with PAL?
6	two that I remember.	6	A. I'm sure I did. I was -- I was a lieutenant in
7	Q. And -- and yourself?	7	the 25th District and I'm sure, you know, we came across
8	A. Yes.	8	PAL. But I wasn't a member of the board at that point.
9	Q. And just so that we're clear, I'm asking you	9	Q. You were not a member of the board, obviously,
10	about a meeting regarding the actual hiring, or I should	10	but were you -- were you assigned to the PAL detail at
11	say, the promotion or assignment of Evelyn Cintron to	11	any time during your service as a police officer?
12	take over as commander at PAL. I'm not asking about any	12	A. No, I was not.
13	planning meetings or anything like that. I'm asking you	13	Q. Okay. And the -- so PAL was a stand-alone
14	about a meeting that took place prior to her actual	14	501(c)(3) organization, correct?
15	assignment.	15	A. Correct.
16	A. Correct. Yes.	16	Q. And then you have the Philadelphia Police
17	Q. Okay. And so you only recall three people	17	Department and in tandem they work the Police Athletic
18	being at that meeting with Ms. Cintron?	18	League; is that right?
19	A. Correct.	19	A. Correct.
20	Q. Okay. Was there a vote taken regarding	20	Q. And what you've just explained is that Ted
21	Ms. Cintron becoming the commander at PAL?	21	Quali is the executive director and he reports to the
22	A. There was no vote, but there was feedback	22	PAL board; is that right?
23	provided to the police department.	23	A. Correct.
24	Q. Okay. And shortly thereafter, Ms. Cintron	24	Q. And Lieutenant Cintron is the commanding

<p>1 officer back -- at this time, in 2016, she's the      2 commanding officer of the police personnel at PAL?      3 A. Correct.      4 Q. Okay. There is some level of collaboration      5 between the two, isn't there?      6 A. Yes.      7 Q. Okay. Can you tell us about that?      8 A. The mission of PAL is helping kids, as the logo      9 says, and the police assigned to the various PAL centers      10 are fulfilling the mission of the Police Athletic      11 League.      12 So they would come up with great ideas. The      13 commanding officer would really work closely with the      14 police of all districts. The commanding officer was      15 much like a commanding officer of a district. The      16 commanding officer was responsible for all assignment      17 issues, discipline issues, you know, performance issues,      18 and also creative issues working hand in hand with the      19 executive director and the civilian staff and the board.      20 So it was a collaborative environment, and at      21 the same time there were roles that were performed that      22 people were aware of what their responsibilities were.      23 Q. Okay. Well, isn't part of the mission of PAL      24 to provide a safe place for these students and children   </p>	Page 16	<p>1 Q. Okay. Do you recall any type of budgeting and      2 allotment being made for repairs at the Wissinoming      3 Center?      4 A. Not specifically.      5 Q. Do you recall litigation related to the      6 condition of the PAL center at Wissinoming?      7 A. No, I do not.      8 Q. Do you recall litigation related to the      9 condition of any of PAL centers?      10 A. Not really, no.      11 Q. Okay. Do you recall financing and budgeting      12 line items for the maintenance and repair of any of the      13 PAL centers?      14 A. Well, that was a standard in the budget;      15 preventative maintenance, capital maintenance. But      16 specifically, you know, I didn't -- I didn't do the      17 budget so I don't have any specifics that I can      18 remember.      19 Q. Okay. Do you recall any PAL centers being      20 closed due to their condition?      21 A. I don't.      22 Q. So as we sit here today, Ms. Rush, you don't      23 recall any PAL centers being closed related to their      24 condition? You don't recall any financial line items   </p>	Page 18
<p>1 in the community to play and grow, correct?      2 A. Absolutely.      3 Q. Okay. And so I would assume that the police      4 side of the PAL Police Department relationship, they      5 have a lot to do with that safety and security provision      6 in terms of providing that for the young people,      7 correct?      8 A. Correct.      9 Q. Okay. And so the commanding officer would have      10 some responsibility as it related to that also, right?      11 A. Correct.      12 Q. Okay. So it's not just about assignments and      13 shift changing, right? They actually have real      14 responsibilities and duties related to the safety of the      15 people who are there, correct?      16 A. Correct.      17 Q. Now, did there -- did there ever come a time      18 where you became aware of substandard conditions at a      19 PAL center, the Wissinoming Center for PAL?      20 A. I don't recall that, no.      21 Q. You don't recall that.      22 You were on the Finance Committee back in 2016      23 though, correct?      24 A. I believe so.   </p>	Page 17	<p>1 being attributed to the repair of PAL centers that were      2 in poor condition; is that right?      3 A. You know, that's kind of a multi question      4 there.      5 Q. It is, and I should break it up.      6 You said that you recall the line item related      7 to preventative maintenance. And what I'm asking you      8 is -- I'm not asking about preventative maintenance.      9 I'm asking about PAL centers that were in poor repair      10 and needed to have maintenance and actually be closed to      11 be repaired. Do you recall budgeted line items for      12 those kind of issues at PAL centers?      13 A. I do not.      14 Q. Okay. Now I want to ask you about a meeting      15 with Ms. Cintron. So not about the meeting where      16 Ms. Cintron is, essentially, I guess, interviewed and      17 there's feedback, the meeting that we discussed earlier.      18 I'm not asking about that. I'm asking you now about a      19 meeting that you, yourself, and Ms. Cintron had as a      20 one-on-one dinner meeting.      21 Do you recall that meeting, ma'am?      22 A. I'm sorry. Are we talking about a dinner or a      23 meeting?      24 Q. Well, you had dinner. It was just you and   </p>	Page 19

<p style="text-align: right;">Page 20</p> <p>1 Ms. Cintron. So we can -- we can talk about what      2 happened there, but it was just the two of you. So no      3 one else. And I don't know how many times you had      4 dinner with Ms. Cintron. You can tell us.      5 How many times have you had dinner one on one      6 with Ms. Cintron?      7 A. One time.      8 Q. Okay. So that's the -- that's the moment that      9 I'm talking about.      10 A. Okay.      11 Q. Do you recall where that took place?      12 A. Yes.      13 Q. Where was it?      14 A. It was at a restaurant that's attached to the      15 first level of the Inn at Penn, 3600 block of Samson      16 Street. I believe it's no longer there. I believe it      17 was called Penne, P-e-n-n-e.      18 Q. Okay. And do you recall how that dinner came      19 to be?      20 A. I invited the lieutenant.      21 Q. You invited her to that dinner?      22 A. Yes.      23 Q. And when you invited her to that dinner didn't      24 you tell her that she was coming to that dinner to</p>	<p style="text-align: right;">Page 22</p> <p>1 A. I don't recall.      2 Q. Okay. So do you recall when that meeting took      3 place?      4 A. I don't.      5 Q. Okay. Now, although you do not recall what      6 Lieutenant Cintron was told to get her to that meeting      7 with you, can you tell us what she was told once she was      8 at the meeting with you?      9 A. Sure. It was an opportunity for us to have a      10 meet-and-greet and to kind of do what I would do for any      11 new leadership people, not just at PAL but in general.      12 I'm on numerous boards and would do that, have -- have      13 them out for a bite to eat, see how things are going and      14 see if I can be supportive in any way.      15 Q. Okay. Well, when we spoke earlier about the      16 duties that you had as a member of the executive board      17 and all those other committees, you didn't mention any      18 kind of meet-and-greet.      19 In fact, you're also a member of the      20 Nominations Committee and you didn't mention any      21 meet-and-greet as a part of your standard operating      22 procedure or as a part of your duties. So I'm a bit      23 confused as to what you're telling us now about this      24 meet-and-greet.</p>
<p style="text-align: right;">Page 21</p> <p>1 discuss programming?      2 A. I don't recall what -- first off, my assistant      3 set it up. I don't recall what was said to the      4 lieutenant.      5 Q. Okay. So you don't know what she was told to      6 get her to that meeting?      7 A. Correct.      8 Q. And you, yourself, never spoke with her about      9 that meeting prior to it actually happening; is that      10 right?      11 A. Correct.      12 Q. So at no time did you tell her that you didn't      13 want to meet at your office or at PAL offices but rather      14 at The Inn at Penn?      15 A. I don't recall.      16 Q. Well, you just told us that you never spoke      17 with her, that your assistant set that meeting up,      18 right?      19 A. Correct.      20 Q. Okay. And so what I'm asking you now is when      21 you're telling us that you never spoke with her      22 regarding that meeting, are you telling us that you      23 never had a conversation with her prior to walking into      24 the restaurant at The Inn at Penn and seeing her there?</p>	<p style="text-align: right;">Page 23</p> <p>1 Are you telling us that this was one of your      2 duties or are you telling us that this was kind of an ad      3 hoc thing that you would just up and do?      4 A. It's not any duty. I'm a volunteer member and      5 I've served because I believe in the organization and it      6 is my practice in life to try to help people as they      7 onboard.      8 And so do I onboard and have time to go to      9 lunch with every new member of the Nominations      10 Committee? No. Sometimes? Maybe. But a new      11 commanding officer, a new captain of the district that      12 covered Penn, a new commissioner, they're the kinds of      13 things I'm talking about.      14 There's no duty here. It is -- it is out of      15 courtesy and trying to be helpful to anyone who is new      16 in a position that I am somewhat involved in. And as a      17 board member, that was the case here.      18 Q. Okay. So despite the fact that you were having      19 this meet-and-greet as a courtesy to Lieutenant Cintron,      20 as you recall, you didn't even make the call to extend      21 the invitation to her yourself? Your secretary did      22 that? And although you apparently knew the purpose of      23 it was simply a meet-and-greet and to introduce and      24 provide support to Lieutenant Cintron, you can't recall</p>

<p style="text-align: right;">Page 24</p> <p>1 what she would have been told to get her to the meeting?</p> <p>2 A. Well, you know, not quite the way you're</p> <p>3 describing this. My executive assistant set up all my</p> <p>4 meetings and she would peripherally know what the</p> <p>5 meeting was about. If it was a lunch meeting, it may be</p> <p>6 onboarding a new Dean at Penn.</p> <p>7 It was a meet-and-greet. I don't have -- you</p> <p>8 know, for those kinds of things you don't have an</p> <p>9 agenda. You have -- you know, you meet people. You get</p> <p>10 to know them a little better.</p> <p>11 I'm sure that my assistant, who was very</p> <p>12 familiar with this practice, would probably have given</p> <p>13 some peripheral information such as that.</p> <p>14 Q. Okay. Who was your assistant at that time?</p> <p>15 A. Danielle Faust, F-a-u-s-t.</p> <p>16 Q. Faust. Okay.</p> <p>17 So you think that your assistant would have</p> <p>18 given some kind of peripheral information regarding just</p> <p>19 a meet-and-greet?</p> <p>20 A. That's my understanding, yes.</p> <p>21 Q. Okay. And this was actually not a lunch</p> <p>22 meeting? This was actually dinner with Lieutenant</p> <p>23 Cintron? Do you recall?</p> <p>24 A. That's correct.</p>	<p style="text-align: right;">Page 26</p> <p>1 Q. Okay. Did you -- do you recall telling</p> <p>2 Lieutenant Cintron that the other individuals associated</p> <p>3 with PAL wanted you to meet with her woman to woman?</p> <p>4 A. No, I don't recall.</p> <p>5 Q. Okay. Do you recall Lieutenant Cintron asking</p> <p>6 you if we were talking about Rob [sic] Rabena, Bernie,</p> <p>7 and the District Deputy Commissioner Sullivan? Do you</p> <p>8 recall her asking you if those were the people who put</p> <p>9 you up to having the meeting with her? Do you recall</p> <p>10 that?</p> <p>11 A. I don't recall.</p> <p>12 Q. Okay. Do you recall answering that question in</p> <p>13 the affirmative and referring to them as the good old</p> <p>14 boys?</p> <p>15 A. I don't recall.</p> <p>16 Q. Okay. Do you recall telling Lieutenant Cintron</p> <p>17 that she should just sit back and allow the men to run</p> <p>18 PAL?</p> <p>19 A. Well, I don't recall that, but I will assure</p> <p>20 you that is not something that would ever come out of my</p> <p>21 mouth as a trailblazing woman in the police department</p> <p>22 and at Penn and on the board.</p> <p>23 Q. Okay. Well, then you know what you didn't say.</p> <p>24 But the issue that I have with you, Ms. Rush, is that</p>
<p style="text-align: right;">Page 25</p> <p>1 Q. Okay. And do you recall Lieutenant Cintron at</p> <p>2 least being under the impression that you all were there</p> <p>3 to discuss programming?</p> <p>4 A. I don't know what she was under the impression</p> <p>5 of.</p> <p>6 Q. Okay. Do you recall her attempting to discuss</p> <p>7 programming with you at that meeting?</p> <p>8 A. I believe programming came up in the</p> <p>9 conversation.</p> <p>10 Q. Okay. Do you recall telling her, no, you just</p> <p>11 wanted to enjoy dinner first and then you could get to</p> <p>12 why you were there to actually speak with one another?</p> <p>13 Do you recall telling her that?</p> <p>14 A. There's no separation of what you're</p> <p>15 describing. It is a meet-and-greet and, as such, work</p> <p>16 stuff will come up because we're on the same team. I</p> <p>17 was on the board and she was the commanding officer in a</p> <p>18 new position and I'm sure we discussed things like that.</p> <p>19 Q. I understand. But my question was, do you</p> <p>20 recall telling Lieutenant Cintron that you did not want</p> <p>21 to talk about programming at that time, you just wanted</p> <p>22 to start to enjoy dinner, and then you would tell her</p> <p>23 why you were all really there to meet?</p> <p>24 A. I don't recall.</p>	<p style="text-align: right;">Page 27</p> <p>1 you can't remember what you did say. So tell us what</p> <p>2 you did say at this dinner meeting.</p> <p>3 A. Well, you didn't quite ask me what I said.</p> <p>4 What I can tell you is what I can remember. And I don't</p> <p>5 remember how many years ago this is, but I will give you</p> <p>6 my best recollection of that one encounter and one</p> <p>7 dinner.</p> <p>8 I wanted to ensure that -- first off, we had a</p> <p>9 lot in common. I worked the 25th District as a police</p> <p>10 officer. She worked as a lieutenant in the 25th and did</p> <p>11 a very nice job working with the community and she had a</p> <p>12 lot to be proud of. We talked a lot about that.</p> <p>13 And then she had never worked in an assignment</p> <p>14 where there was -- where it was a not-for-profit board.</p> <p>15 So I tried to outline for her the duties of the</p> <p>16 executive director versus the duties of the police</p> <p>17 commander. And I think there had been some -- I don't</p> <p>18 know -- misperceptions about who was responsible for</p> <p>19 what and I wanted to take that opportunity to help her</p> <p>20 succeed in this role.</p> <p>21 She had a lot to offer and we wanted her to</p> <p>22 succeed and so we wanted to -- I wanted to make sure</p> <p>23 that she understood the roles of each of those</p> <p>24 positions. And those roles overlapped in a lot of ways</p>

<p style="text-align: right;">Page 28</p> <p>1 around strategy, but there were specific roles that she      2 was responsible for and there were specific roles that      3 the executive director was responsible for.      4 Q. Okay. And the executive director that we're      5 talking about is Ted Quali; is that correct?      6 A. Correct.      7 Q. And did you -- so you met with her in an effort      8 to define these roles for her?      9 A. Correct.      10 Q. Okay. Well, when we began this conversation      11 regarding this meeting, Ms. Rush, you told me that this      12 meeting was simply a meet-and-greet. You told us that      13 this meeting was something that you do with everyone,      14 that you would have done with anyone else taking over a      15 police district or the district that Penn sits in or for      16 any other board that you were on. That's why you told      17 us that you met with her.      18 Now you're telling us that you met with her      19 because you needed to define the role of the executive      20 director versus her role as the police commander at PAL.      21 That sounds like an agenda to me.      22 Are you telling us that you did not have an      23 agenda when you went to that meeting with her on that      24 evening and that it was still just a meet-and-greet?</p>	<p style="text-align: right;">Page 30</p> <p>1 been aware that the position was unique; yes?      2 A. Yes.      3 Q. Okay. You said that there had been problems      4 regarding the executive director and the police      5 commander, correct?      6 A. I don't recall saying that.      7 Q. Well, there had been some issues leading to you      8 feeling as though you needed to outline the differences      9 in these duties between the executive director and the      10 police commander; no? Did I misunderstand that?      11 A. Well, I didn't say it was a problem. I said it      12 was a -- it was a new commanding officer coming into a      13 new position and I believed that there was some      14 misperceptions about what the role was for the      15 lieutenant commanding officer of the Philadelphia Police      16 PAL Unit.      17 Q. Okay. And --      18 A. Also, to inform her of what the executive      19 director's role was.      20 Q. Okay. So your word is misperceptions. All      21 right.      22 Regardless of that, what I'm getting at is      23 this, Ms. Rush: Were you aware of those misperceptions      24 prior to the meeting or are you telling us that you</p>
<p style="text-align: right;">Page 29</p> <p>1 ATTORNEY GOLDEN: Objection. Go ahead.      2 THE WITNESS: I'm telling you that the original      3 purpose of the meeting was a meet-and-greet and to get      4 to know her better. And as the dinner evolved and the      5 evening evolved, we did discuss the way that Penn      6 operates -- I'm sorry, the way that PAL operates.      7 And I've been a long-time member of the board      8 and have helped other commanding officers when they      9 started because it's unique and it's different than any      10 other assignment in the Philadelphia police.      11 In conversation that came up, was that an      12 agenda item? Not necessarily. My agenda was to welcome      13 her, to help her be successful, and to try to explain      14 the difference of roles and to realize that this is a      15 unique position inside the Philadelphia Police      16 Department.      17 BY ATTORNEY FITZPATRICK:      18 Q. Well, there's only one PAL commander in the      19 Philadelphia Police Department, correct?      20 A. That's correct.      21 Q. All right. You think she was aware of that,      22 correct?      23 A. Yes.      24 Q. Okay. So is it safe to say that she would have</p>	<p style="text-align: right;">Page 31</p> <p>1 found out about those misperceptions during your dinner?      2 A. Both.      3 Q. Both?      4 A. Yes.      5 Q. And so -- well, that's an interesting answer,      6 because I don't know that the answer can be both. So      7 I'll rephrase my question.      8 Were you aware of misperceptions between the      9 executive director and the police commander prior to      10 your dinner?      11 A. Yes.      12 Q. Okay. Now, during your dinner I take it that      13 you were given additional information regarding what      14 you've described as misperceptions from Lieutenant      15 Cintron. Is that what you're telling us?      16 A. Yes.      17 Q. Okay. So my very pointed question to you now      18 is, at the time that you set up that dinner with      19 Lieutenant Cintron, are you telling us that you had no      20 intention of addressing these misperceptions with her?      21 A. I'm not saying that.      22 Q. Okay. So you did intend on addressing the      23 misperceptions with her, correct?      24 A. I didn't say that either.</p>
<p>215-341-3616 transcripts@everestdepo.com Everest Court Reporting LLC</p>	<p>Page: 10 (28 - 31)</p>

<p style="text-align: right;">Page 32</p> <p>1 Q. Okay. Well, did you intend to address the 2 misperceptions with her at the dinner?</p> <p>3 A. This was a meet-and-greet and I wanted to 4 understand how she was feeling about her new assignment 5 and if it came up, absolutely. If it didn't come up, it 6 would have been just other conversations.</p> <p>7 Q. Okay. So you're telling us you didn't bring it 8 up?</p> <p>9 A. I don't recall. I don't recall who brought it 10 up.</p> <p>11 Q. Well, now, if you brought it up, then of course 12 it would come up and so of course it would be addressed. 13 So you can't say if it came up, then we would talk about 14 it. If it didn't come up, we wouldn't talk about it if 15 you're the person who brought it up.</p> <p>16 So my question is, did you bring it up?</p> <p>17 A. Well, here's the thing, it was a conversation. 18 Who brought it up first? I don't recall sitting here 19 today.</p> <p>20 Q. Okay. But you do recall that you requested the 21 meeting?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And how long did this dinner last?</p> <p>24 A. I don't know.</p>	<p style="text-align: right;">Page 34</p> <p>1 A. I'm not saying that it didn't come up. I don't 2 have any total recollection of what else we talked about 3 around other people.</p> <p>4 Q. Okay. And do you have any recollection of what 5 you said? Now you've told us what you talked about. 6 And this is the only thing you can recall talking about; 7 is that right?</p> <p>8 A. You know, at dinner you talk about a lot of 9 things. You talk about your kids. You talk about how 10 you started on the job.</p> <p>11 She was interested in how it was in 1976, when 12 myself and 99 other women plowed the way into law 13 enforcement for other women, including her.</p> <p>14 And, you know, it was a general conversation. 15 And, you know, again, the purpose of it was a 16 meet-and-greet. The purpose was to help a fellow female 17 officer, a lieutenant, succeed in the position.</p> <p>18 Q. To help a fellow female officer succeed and 19 that would have been by giving her advice, correct?</p> <p>20 A. Guidance.</p> <p>21 Q. Guidance.</p> <p>22 Okay. And in this particular case, because her 23 assignment is commanding officer at PAL, you would have 24 been giving her guidance and advice about how to proceed</p>
<p style="text-align: right;">Page 33</p> <p>1 Q. Do you recall Lieutenant Cintron pointing out 2 to you that as a woman she had to work twice as hard to 3 get to where she was and she wasn't going to sit back 4 and just let men handle everything?</p> <p>5 A. I don't recall.</p> <p>6 Q. Do you recall her telling you that?</p> <p>7 A. I don't recall that, no.</p> <p>8 Q. Okay. Beyond the executive director, Ted 9 Quali -- who is a man, correct?</p> <p>10 A. Correct.</p> <p>11 Q. -- and you defining his role versus Lieutenant 12 Cintron's role, were there any other roles that you 13 defined for Lieutenant Cintron?</p> <p>14 A. I don't recall.</p> <p>15 Q. Okay. Did you -- do you recall explaining to 16 her what Rob [sic] Rabena's role was?</p> <p>17 A. I don't recall specifically what I explained or 18 not. It probably came up, but I don't know. I can't 19 sit here today and tell you what that conversation was.</p> <p>20 Q. Okay. But you do know that you defined Ted 21 Quali's role from Lieutenant Cintron's role? You recall 22 that?</p> <p>23 A. I do.</p> <p>24 Q. But no others, correct?</p>	<p style="text-align: right;">Page 35</p> <p>1 on that assignment, correct?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. And so all I'm asking you quite simply 4 at this point is, what guidance and advice did you give 5 her?</p> <p>6 A. As I said earlier, I tried to outline for her 7 the distinction between the role of commanding officer 8 of the Police PAL Unit versus the commanding -- the 9 executive director of PAL who oversaw all the civilian 10 staff and was responsible for running a not-for-profit 11 board reporting to a board of directors.</p> <p>12 Q. Well, forgive me, Ms. Rush, but that seems like 13 information that someone could have gotten from a 14 pamphlet. That's hardly the kind of information that I 15 would expect a trailblazer from 1976 to be providing to 16 someone at dinner.</p> <p>17 So aside from outlining those roles, what 18 guidance and advice did you give Lieutenant Cintron 19 regarding being a female commander in her position?</p> <p>20 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>21 ATTORNEY ULAK: I'll join the objection.</p> <p>22 THE WITNESS: Well, you know, what I was trying 23 to help Lieutenant Cintron understand is what her role 24 was. And in saying what her role was, yes, did I go</p>

<p>1 into more detail? I'm sure.</p> <p>2 You know, you're -- you have a -- we, I believe 3 at the time, had some police officers that were assigned 4 to PAL that needed to be re-invigorated, let's say. She 5 was aware of that and actually came into the role, I 6 think, intending to do that.</p> <p>7 So we talked about the great needs and 8 responsibilities, which were many, of being the 9 commanding officer over the police and also then what 10 were the specific roles that the executive director 11 would be responsible for, which is not written in any 12 pamphlet.</p> <p>13 Just like most jobs, there's job descriptions 14 and then there's -- you know, you get behind the scenes 15 of what people do each and every day and who is 16 responsible to whom, who reports to whom and what that 17 daily responsibility is and what that long-term 18 responsibility is. And so we just really -- you know, I 19 wanted to make sure that -- she was still new there and 20 it was a completely different role than any other 21 position in the police department in that you're 22 interacting with basically a not-for-profit board with a 23 full board of directors and an executive director. So 24 everything in between there is what we discussed.</p>	<p>Page 36</p> <p>1 interacted with the board and with the executive 2 director.</p> <p>3 Q. Well, right. And so you said that the rest 4 would fall into place. What are you referring to when 5 you say that?</p> <p>6 A. Well, it was clear there was some friction 7 between the executive director and the lieutenant and I 8 believe the friction came because of understanding 9 roles.</p> <p>10 And what I mean by that is if everyone is 11 working as a team cooperatively and understanding the 12 impact that you can make and the impact that other 13 person can make and the impact the board can make, that 14 this was an opportunity -- we are here to serve the 15 children of Philadelphia. And that's what we are trying 16 to do. And that's -- that's what I mean by falling into 17 place, making sure it was a successful operation.</p> <p>18 Q. Okay. Well, you started by saying that there 19 were just misperceptions. Now we've graduated to 20 friction between the executive director and the 21 commanding officer.</p> <p>22 And just so that I'm clear, again, you were 23 never assigned to PAL as a police officer, correct?</p> <p>24 A. Correct.</p>
<p>1 Q. Okay. So you didn't give her any advice 2 regarding how her interactions should go with people, 3 the executive director or any other board members, 4 correct?</p> <p>5 A. You know, I didn't get into how you should 6 treat people. We got into the roles of people, which in 7 turn would, you know, work cooperatively with one 8 another; ensure that, you know, you were coming to board 9 meetings.</p> <p>10 The commanding officer always had a role at the 11 full board meeting -- executive board meetings to report 12 out on the different accomplishments and -- you know, it 13 was more about that. It was more about that and that 14 the rest would fall into place if people knew what their 15 roles were. And to basically really work on the things 16 that were in her control and what was expected of her 17 from the police commissioner, to oversee -- I don't 18 remember how many there were at the time. Maybe 34 19 police officers. But to make sure -- just like a 20 captain would of a district, same responsibilities. 21 And, again, I don't know what the police commissioner's 22 orders are. I'm not privy to that. But in watching 23 other commanding officers, that's what it appeared to me 24 to be, that that's what they did, and they certainly</p>	<p>Page 37</p> <p>1 Q. So you were never a commanding officer in the 2 PAL assignment, correct?</p> <p>3 A. Correct.</p> <p>4 Q. All right. And, in fact, there is a deputy 5 commissioner or a commissioner that Lieutenant Cintron 6 would report to in her chain of command, correct?</p> <p>7 A. Correct.</p> <p>8 Q. And at any point during this conversation did 9 you advise Lieutenant Cintron to report anything to her 10 deputy commissioner or to the commissioner?</p> <p>11 A. I don't specifically recall that, no.</p> <p>12 Q. Okay. Were you aware at this point that there 13 was a Memorandum of Understanding that was being 14 presented concerning the various roles of the Police 15 Athletic League, civilian employees, and the police 16 personnel?</p> <p>17 A. I was aware of it, yes.</p> <p>18 Q. Okay. And were you aware that Lieutenant 19 Cintron was one of the proponents of that memorandum in 20 terms of trying to get those roles defined?</p> <p>21 A. I don't recall that.</p> <p>22 Q. Okay. Were you aware of this pending 23 memorandum prior to having this dinner with Lieutenant 24 Cintron?</p>

<p>1 A. I don't recall the timing. 2 Q. Okay. But at any rate, you did not discuss 3 this memorandum; is that right? 4 A. Not that I recall. 5 Q. Okay. You just happened to discuss the things 6 that would have been covered by the memorandum; is that 7 right?</p> <p>8 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>9 THE WITNESS: I don't know what was in the 10 memorandum. It was not something that I was totally 11 involved in. I heard about it. I don't have a clue 12 what was in it. And the discussion that we had was 13 specifically what was in front of us right then and 14 there.</p> <p>15 BY ATTORNEY FITZPATRICK:</p> <p>16 Q. Okay. Well, what I'm asking you is that the 17 memorandum is a direct result of the misperceptions and 18 friction between the commanding officer and the 19 executive director of PAL. And are you telling us that 20 it just co- -- by coincidence you discussed the very 21 same things that were going to be addressed by this 22 Memorandum of Understanding?</p> <p>23 Although you were aware of the Memorandum of 24 Understanding and you were aware of the misperception</p>	<p>Page 40</p> <p>1 individuals, are you talking about working alongside 2 men? 3 A. I'm sorry. I don't understand your question. 4 Q. You said that you were intending to discuss 5 with Lieutenant Cintron working alongside these people 6 which you have had the experience of doing for years. 7 A. No. What I was saying was that my role -- I 8 was -- my history of being on the board and my history 9 previously at Philadelphia Police Law Enforcement was 10 that I had worked alongside previous commanding officers 11 of PAL and, obviously, been assigned to it, because, you 12 know, PAL members go -- PAL board members, you know, go 13 to the Christmas parties and raise money for the gala 14 and things like that. So, yes, I was very familiar with 15 the police officers, not all, but some, and -- and, 16 again, worked closely with the executive -- I'm sorry, 17 the commanding officer of PAL.</p> <p>18 BY ATTORNEY FITZPATRICK:</p> <p>19 Q. Right. But, I'm sorry, my question was a much 20 simpler one. I should have been more clear. All I'm 21 asking you is, you would agree with me that the 22 Philadelphia Police Department for many years, and even 23 the PAL board to a degree, were male dominated -- 24 predominantly male organizations and people that you</p>
<p>1 and the friction, you're telling us that it was not your 2 intention to discuss the Memorandum of Understanding 3 with Lieutenant Cintron on that date; is that right?</p> <p>4 ATTORNEY ULAK: Objection.</p> <p>5 ATTORNEY GOLDEN: Objection.</p> <p>6 ATTORNEY ULAK: Sorry. You can answer. I just 7 objected.</p> <p>8 THE WITNESS: What I'm saying to you is, I was 9 discussing with Lieutenant Cintron my experience of 10 working alongside members of the Philadelphia Police 11 Department, and especially as a board member working 12 with past police commanders of PAL and the 13 distinction -- which, I believe Ted Quali was the first 14 executive director, so it was different than maybe a 15 past commanding officer. So that was my -- that was 16 where I was coming from.</p> <p>17 I wanted to ensure that -- this was kind of a 18 new model for PAL. I don't know how many years he was 19 there, but it was -- it was a little bit different than 20 somebody 20 years ago who was the commanding officer -- 21 police commanding officer. So that was -- that was 22 where I was basing that conversation on.</p> <p>23 BY ATTORNEY FITZPATRICK:</p> <p>24 Q. Well, when you say working alongside these</p>	<p>Page 41</p> <p>1 were working with and around?</p> <p>2 ATTORNEY GOLDEN: Objection.</p> <p>3 THE WITNESS: You know what, by that year, not 4 so much. There were female officers. There were, I 5 believe, one or two female sergeants in PAL at the 6 police department. The board was very diversified in 7 both gender and race.</p> <p>8 So the experience of working at PAL -- in my 9 case the experience of serving on this not-for-profit 10 board, I didn't see it just being all men.</p> <p>11 BY ATTORNEY FITZPATRICK:</p> <p>12 Q. Well, I didn't say all men. I said 13 predominantly men. And so if there's one out of 27, 14 you'd have to agree with me that that would still be 15 predominantly male, correct?</p> <p>16 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>17 THE WITNESS: You're asking me my experience 18 and my experience was I didn't experience PAL or the PAL 19 board as being predominantly male. I'm not sitting here 20 doing statistics, but that was my experience.</p> <p>21 BY ATTORNEY FITZPATRICK:</p> <p>22 Q. Okay. Well, how many -- you said you're on the 23 Executive Committee, correct?</p> <p>24 A. Correct.</p>

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1	Q. Okay. And who's on the Executive Committee?	1	a past president that was Sylvia Nisenbaum. And, again,
2	A. I have no idea to name them right now, but	2	I can't guess at who else was on the board that year.
3	there was a mixture of men and women.	3	Q. Okay. So yourself as the secretary and there
4	Q. Okay. Well, who was the -- I think we talked	4	was a past president. Did the past president have
5	about the executive director. That was Ted Quali,	5	duties?
6	correct?	6	A. She was on the executive board and definitely,
7	A. Correct.	7	you know, helping guide issues for the -- for the board.
8	Q. The president of the board, was that Rob [sic]	8	Q. Okay. So aside from the public board meetings
9	Rabena?	9	that would occur, there would be sometimes private
10	A. I believe so.	10	planning meetings or committee meetings, correct?
11	Q. Okay. And the vice president, was that Bernie	11	A. Correct.
12	Prazenica?	12	Q. Would you take part in those meetings?
13	A. Prazenica, yes.	13	A. On the ones I was involved with.
14	Q. Prazenica. I'm sorry.	14	Q. Okay. So by that, do you mean with finance?
15	And that was the leadership team that would	15	A. Finance and the Executive Committee.
16	meet regarding the direction of PAL, wasn't it?	16	Q. And the Executive Committee?
17	ATTORNEY GOLDEN: Objection. Go ahead.	17	A. And the Nominations Committee.
18	THE WITNESS: I mean, if you have a listing in	18	Q. Okay. And who was on the Executive Committee?
19	front of you, I'd be happy to have you name them. But I	19	A. I don't -- again, I -- it changes and I have no
20	know for a fact -- I believe that the chair before Ron	20	idea to go down a list without seeing the history of who
21	Rabena was Sylvia Nisenbaum and Sylvia still remained on	21	was on at the time.
22	the executive board. There were other women that were	22	Q. How often did the Executive Committee meet?
23	on the executive board, I believe, as well.	23	A. I don't recall the sequence. Several times a
24	BY ATTORNEY FITZPATRICK:	24	year in addition to the full board meeting.
	Page 45		Page 47
1	Q. All right. But that's not my question. My	1	Q. Okay. What about the Finance Committee, how
2	question is that at this time, in 2016, when Ted Quali	2	often did the Finance Committee meet?
3	was the executive director, Rob [sic] Rabena was the	3	A. Pretty much the same.
4	president, Bernie was the vice president, that was the	4	Q. Several times a year?
5	leadership team at that point in time, correct?	5	A. Correct.
6	ATTORNEY GOLDEN: Objection. Go ahead.	6	Q. Is that on a monthly basis?
7	THE WITNESS: Actually, Bernie was the	7	A. No.
8	treasurer and Ron Rabena was the president. I think	8	Q. Okay. Are you aware of any groups of board
9	they just switched it.	9	members or officials with PAL who met on a monthly
10	BY ATTORNEY FITZPATRICK:	10	basis?
11	Q. Okay. So Bernie was the treasurer?	11	A. Not specifically, no.
12	A. Yes.	12	Q. So then it's safe to say that you did not take
13	Q. Okay. And Rob [sic] was the chair?	13	part in any meetings that occurred on a monthly basis?
14	A. Ron was the chair.	14	A. Yes, that would be safe to assume.
15	Q. Ron was the chair.	15	Q. Okay. Were you aware of any meetings that took
16	And Ted was the executive director?	16	place every two months?
17	A. Yes.	17	A. Not specifically.
18	Q. And that was the leadership team, correct?	18	Q. Okay. So if I told you that Bernie, Rob [sic],
19	ATTORNEY GOLDEN: Objection.	19	and Ted met on a relatively consistent basis once every
20	THE WITNESS: There were more people on the	20	month, that would not be -- that would be something that
21	leadership team than that.	21	would surprise you?
22	BY ATTORNEY FITZPATRICK:	22	ATTORNEY GOLDEN: Objection. Go ahead.
23	Q. Okay. Well, who were they?	23	THE WITNESS: It would not surprise me.
24	A. Well, I was the secretary of the board. We had	24	BY ATTORNEY FITZPATRICK:

<p style="text-align: right;">Page 48</p> <p>1 Q. Okay. And if I told you that Lieutenant 2 Cintron had been promised that she was going to be a 3 part of those meetings, would it surprise you?</p> <p>4 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>5 THE WITNESS: I have no knowledge of that.</p> <p>6 BY ATTORNEY FITZPATRICK:</p> <p>7 Q. Okay. Well, you had knowledge of what prior 8 executive directors and -- I'm sorry, not prior 9 executive directors -- prior commanding officers for PAL 10 had done and participated in, correct?</p> <p>11 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>12 THE WITNESS: It was a different model. We 13 didn't have an executive director. And once the 14 executive director came on board, the commanding officer 15 wasn't involved in everything that the executive 16 director was involved in with the board.</p> <p>17 BY ATTORNEY FITZPATRICK:</p> <p>18 Q. Okay. So are you telling us that the -- 19 there's someone who preceded Lieutenant Cintron, 20 correct, in the position?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. Who was that person?</p> <p>23 A. It was Bill and I can't recall his last name. 24 His last name's escaping me.</p>	<p style="text-align: right;">Page 50</p> <p>1 BY ATTORNEY FITZPATRICK:</p> <p>2 Q. Okay. If the board wanted to communicate 3 information to the executive director, how was that 4 done? How did that chain of communication work?</p> <p>5 A. I don't know.</p> <p>6 Q. Okay. Well, you -- you're on the Executive 7 Committee now, correct?</p> <p>8 A. Correct.</p> <p>9 Q. And you're on the Finance Committee, correct?</p> <p>10 A. Correct.</p> <p>11 Q. And you're on the Nomination Committee, 12 correct?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. So the question that I'm asking you 15 is -- I'll give you a hypothetical. If PAL Center 16 Number 26 had gone overbudget and the board wanted the 17 executive director to address that issue, how would you 18 get that message to the executive director?</p> <p>19 A. Hypotheticals are difficult to really give an 20 answer to because it depends on what is going on. I 21 wasn't the chair of the Finance Committee, so I have no 22 knowledge how that would happen.</p> <p>23 Q. Okay. So you don't have any knowledge of how 24 to communicate with people who report directly to you as</p>
<p style="text-align: right;">Page 49</p> <p>1 Q. Okay. And he was a lieutenant as well, 2 correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And are you telling us that Ted Quali 5 was not in his position as executive director when this 6 lieutenant was running PAL from the police side?</p> <p>7 A. I believe the overlap occurred maybe midterm to 8 the past lieutenant's tenure there.</p> <p>9 Q. Okay. And are you aware of that lieutenant 10 meeting with Ted and Rob [sic] and Bernie regarding the 11 direction of PAL?</p> <p>12 A. I'm not familiar with that.</p> <p>13 By the way, it's Ron, not Rob.</p> <p>14 Q. Ron, I'm sorry. My apologies.</p> <p>15 So you were not aware of that?</p> <p>16 A. I -- no, I was not aware of it.</p> <p>17 Q. Okay. And so you're not aware of these monthly 18 meetings. You don't take part in these monthly 19 meetings. And do you receive any information from these 20 monthly meetings?</p> <p>21 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>22 THE WITNESS: Well, I don't know what monthly 23 meetings you're talking about as far as what they're 24 doing, so no.</p>	<p style="text-align: right;">Page 51</p> <p>1 a board member; is that what you're telling us?</p> <p>2 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>3 THE WITNESS: So I'm sure you're on boards and 4 the chair of the board is generally the key person that 5 does communications and there are times where, you know, 6 other members of the committee or the board might also 7 have roles in communication. But as a general stance, I 8 was not involved in the daily issues that would be 9 presented and so I have no knowledge of how something 10 like that hypothetical question would roll.</p> <p>11 BY ATTORNEY FITZPATRICK:</p> <p>12 Q. Okay. But I think you've answered my question 13 and then disavowed it in the same answer. So that's -- 14 that's why I'm going to ask it again.</p> <p>15 My understanding from what you just said is 16 that the chair of the board would be the key person and 17 communicating to someone like the executive director. 18 And that's really what my question was. But then you 19 went on to say you have no idea who would be the person 20 to communicate, so --</p> <p>21 A. No, that's -- actually, that's not what I said. 22 What I said was I was not the chair of the Finance 23 Committee, of the Executive Committee, nor the 24 Nominations Committee. And what I said is that the</p>

<p style="text-align: right;">Page 52</p> <p>1 chair of the board and the chair of committees have a 2 deeper role than I did, which is basically what I'm 3 saying. I wouldn't know everything they're doing. 4 Q. Okay. So, again, you're not aware of how 5 communication would flow from the board to the executive 6 director?</p> <p>7 A. Not specifically, no.</p> <p>8 Q. No. But even though you're unaware of how 9 communication would flow from the board to the executive 10 director who is in your chain of command as a board 11 member, you felt that you could have dinner with 12 Lieutenant Cintron and explain to her what her role was 13 as it related to the executive director?</p> <p>14 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>15 THE WITNESS: My communication style with the 16 executive director or with Lieutenant Cintron has 17 nothing to do with the question you asked me.</p> <p>18 I am quite aware of the roles. I explained it 19 earlier what the difference was. I was a member of the 20 PAL board before there was an executive director and I 21 know that with the executive director the roles changed.</p> <p>22 I was just trying to be helpful to Lieutenant 23 Cintron to ensure she was aware specifically of the 24 history and how the roles changed and, also, I wanted to</p>	<p style="text-align: right;">Page 54</p> <p>1 who's communicating and how they're communicating with 2 an executive director, I am saying I don't know. I 3 certainly did communicate with the executive director in 4 various ways, especially at board meetings when he was 5 there. I also communicated with Lieutenant Cintron 6 formally at meetings but also informally at events at 7 the PAL center.</p> <p>8 The difference is I'm not the top dog on the 9 board. I don't --</p> <p>10 Q. Yeah, I'm sorry. Ms. Rush, that's not my 11 question. I'm not asking who's the top dog. I'm not 12 even asking you about daily communications.</p> <p>13 I'm asking you how -- and I even gave you a 14 hypothetical that you thought wasn't helpful, I guess. 15 But I'm simply asking you, how did you communicate with 16 the executive director?</p> <p>17 A. And what I just said is at board meetings, 18 especially executive board meetings, we would all be -- 19 there would be a conversation.</p> <p>20 Q. Thank you. Thank you.</p> <p>21 A. You're welcome.</p> <p>22 Q. And so beyond board meetings, did you ever 23 e-mail the executive director?</p> <p>24 A. I'm sure.</p>
<p style="text-align: right;">Page 53</p> <p>1 see her be successful.</p> <p>2 BY ATTORNEY FITZPATRICK:</p> <p>3 Q. Well, right. But I'm not asking you about your 4 communication style, Ms. Rush. What I'm asking you is a 5 much -- a much more pointed question. And maybe it was 6 too convoluted.</p> <p>7 What I'm saying is that you met with Lieutenant 8 Cintron to explain to her the division between her role 9 and the executive director. And now I'm asking you, 10 well, how did the board communicate with the executive 11 director? And you're saying, I don't have any idea.</p> <p>12 And so I'm simply saying, if you don't know how 13 the board communicates to the executive director, how in 14 the world were you able to tell her anything about the 15 role of the executive director or anything else like 16 that if you're telling us you don't even know how you 17 communicate with the executive director?</p> <p>18 ATTORNEY GOLDEN: Objection.</p> <p>19 BY ATTORNEY FITZPATRICK:</p> <p>20 Q. Do you understand my question now?</p> <p>21 A. I understand your question and I think I have 22 answered it different ways and that, perhaps, I'm not 23 communicating as clearly as I can.</p> <p>24 The difference between knowing on a daily basis</p>	<p style="text-align: right;">Page 55</p> <p>1 Q. Directly yourself?</p> <p>2 A. Probably.</p> <p>3 Q. Okay. Did you ever have phone calls with the 4 executive director?</p> <p>5 A. Probably.</p> <p>6 Q. Okay. And so you had a direct line of 7 communication to the executive director; is that right?</p> <p>8 A. Yeah, I had a direct line of communication with 9 the executive director, as I do with tons and tons of 10 people every day.</p> <p>11 Q. Okay. But my point is, you were able to 12 communicate directly with Ted Quali, correct?</p> <p>13 A. Yes.</p> <p>14 Q. And, of course, you were able to communicate 15 directly with your fellow board members, correct?</p> <p>16 A. Correct.</p> <p>17 Q. Those misperceptions and that friction that you 18 spoke about between the executive director and 19 Lieutenant Cintron, where did you derive that 20 information?</p> <p>21 A. Specifically, I can't say. But I did have a 22 conversation with Ted Quali about his frustrations and 23 concerns and what -- what he felt was, you know, 24 happening with communication.</p>

<p>1 Q. And you had that conversation with Ted Quali 2 prior to having that dinner with Lieutenant Cintron, 3 correct?</p> <p>4 A. Possibly, yes.</p> <p>5 Q. Yeah. And did you -- and was that the extent 6 of your conversation -- was that the extent of the 7 information that you received regarding the issues that 8 Ted Quali complained about? In other words, did -- did 9 anyone corroborate what Ted Quali had told you?</p> <p>10 A. I'm sure there were conversations in the 11 executive board meetings similar.</p> <p>12 Q. Okay. So, now, who would have been a part of 13 those conversations?</p> <p>14 A. The executive board and Ted Quali.</p> <p>15 Q. Okay. So that would include Ron?</p> <p>16 A. Yes.</p> <p>17 Q. That would include Bernie?</p> <p>18 A. Yes.</p> <p>19 Q. Okay.</p> <p>20 A. They were there, yeah.</p> <p>21 Q. All right. Would that include the deputy 22 commissioner for the police department?</p> <p>23 A. No, not necessarily.</p> <p>24 Q. No. Okay.</p>	<p>Page 56</p> <p>1 evening at The Inn at Penn, correct?</p> <p>2 A. I will say probably.</p> <p>3 Q. Okay. And although you cannot recall what you 4 specifically told Lieutenant Cintron, what you're 5 telling us today is that you recall attempting to define 6 the roles of the executive director and the commander of 7 PAL; is that right?</p> <p>8 A. That was the crux of what we talked about.</p> <p>9 Because if we had the ability to straighten out the 10 roles and everyone knew what their role was, then there 11 would be more of a partnership and for the good of the 12 children of Philadelphia, we would continue to move 13 forward.</p> <p>14 Q. Right. But there was already a Memorandum of 15 Understanding pending that was going to address those 16 matters, correct?</p> <p>17 ATTORNEY GOLDEN: Objection.</p> <p>18 THE WITNESS: I was not involved in forming the 19 MOU.</p> <p>20 BY ATTORNEY FITZPATRICK:</p> <p>21 Q. I didn't ask if you were involved.</p> <p>22 You've already told us that you were aware that 23 it was forthcoming and -- all right? And it just so 24 happens that you're discussing with Lieutenant Cintron</p>
<p>1 And so you had this dinner with Lieutenant 2 Cintron early on in her work at PAL, correct?</p> <p>3 A. Correct.</p> <p>4 Q. Okay. How many executive board -- how many 5 executive meetings -- committee meetings had you had 6 prior to having that dinner with Lieutenant Cintron?</p> <p>7 A. I don't recall.</p> <p>8 Q. Well, how many do you have in a year?</p> <p>9 A. I'm really bad at calendars. The calendar 10 tells me where to go and my assistant was great, so I 11 don't know.</p> <p>12 Q. Okay. But were these quarterly meetings? We 13 know they weren't monthly meetings.</p> <p>14 A. They weren't monthly. I don't know. Maybe 15 four or five a year. Maybe four. I don't know. As I 16 sit here today without a calendar in front of me, to 17 this day I don't know how many there are.</p> <p>18 Q. Okay. All right. So, Ms. Rush, my point is 19 simply that you had communications with individuals in 20 the leadership at PAL who advised you that there was 21 some kind of an issue, whether you call it 22 misperceptions, friction, whatever term you want to use, 23 and you received information about that from individuals 24 prior to your meeting with Lieutenant Cintron on that</p>	<p>Page 57</p> <p>1 some of the very same things that were supposed to be 2 outlined in the Memorandum of Understanding.</p> <p>3 And so my question is, if those things are 4 going to be outlined in the Memorandum of Understanding, 5 why does she need to have the discussion with you at 6 all?</p> <p>7 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>8 THE WITNESS: Well, first off, what I was 9 discussing was basic. It doesn't need to be in an MOU. 10 It is basic leadership skills and understanding the 11 roles. Whether that was in the MOU or not really wasn't 12 the issue.</p> <p>13 The issue was my experience as a long-time 14 board member who worked with the commanding officer at 15 PAL before there was an executive director, during an 16 executive director, and then hiring -- not hiring but 17 bringing on someone from the police department who knew 18 they were coming into a position where there wasn't an 19 executive director.</p> <p>20 I just wanted to make sure that I could be 21 helpful to the lieutenant in understanding what the 22 roles were. Just like there's roles in a district, 23 there's roles in a chain of command, that's what we are 24 in the police world. So the conversation's really just</p>

<p>1 clarifying exactly that. It's no different than if we 2 were talking about a role in a district. 3 BY ATTORNEY FITZPATRICK: 4 Q. Okay. And it would have been your thought that 5 the lieutenant, despite having had -- having had to have 6 received numerous promotions to reach the rank of 7 lieutenant, would have needed for you to explain to her 8 that there was a chain of command? 9 A. I didn't say that she had to understand the 10 chain of command. I said she had to understand a new 11 role that she was coming into that was unlike any other 12 role that she had performed before. 13 Q. Okay. And you said you had given her general 14 leadership advice. Is that -- do I have that right? 15 A. I talked about -- no, I don't believe I said 16 that. 17 Q. Okay. Well, I don't know. 18 ATTORNEY FITZPATRICK: Can we -- I'm sorry, 19 Lisa. Can we go back? I -- honestly, I thought that's 20 what she did say just in her answer to the last 21 question. She said something regarding leadership, 22 didn't she? 23 (Reporter read back the requested testimony.) 24 BY ATTORNEY FITZPATRICK:</p>	<p style="text-align: center;">Page 60</p> <p>1 things wouldn't go well for her? 2 A. No, I did not say that. 3 Q. And although you had had these discussions with 4 the executive board generally and with Ted Quali 5 directly, it is still your testimony that this meeting 6 that you set up with Ms. Cintron was for the general 7 purpose of a meet-and-greet and not to address all of 8 these issues that you had heard through the executive 9 board and directly from Ted Quali and the MOU that was 10 forthcoming? Is that still your testimony? 11 ATTORNEY GOLDEN: Objection. Go ahead. 12 THE WITNESS: I think my idea of a 13 meet-and-greet and maybe your idea of a meet-and-greet 14 might be a little different. Meet-and-greets are 15 conversations and issues will come up on both sides. 16 What I am saying is it was an opportunity for 17 me to be able to have a meal with a fellow female 18 officer, in her case lieutenant, and we had a lot to 19 talk about about the 25th District. So there was -- 20 there were issues like that. 21 And, yes, I was aware of the friction and I was 22 trying to be helpful so she would be successful in the 23 role because I thought she had a lot to offer and would 24 be great in the role and I just wanted to put some</p>
<p>1 Q. That's what I'm referring to, Ms. Rush. You 2 just said that you were speaking to her regarding basic 3 leadership skills. 4 A. Well, I think that you're taking that out of 5 concept. In my mind, basic leadership skills change as 6 you do new roles. As I got promoted along the way in 7 Philly, as I got promoted along the way at Penn, 8 leadership skills changed depending on the role that you 9 are in. 10 And she did not need any tutoring about being a 11 leader. She was a great leader in the 25th District. 12 She shared all of her leadership skills at the interview 13 and she had proof of her leadership skills. I would in 14 no way insult her about leadership skills. 15 What I meant is that the role of the commanding 16 officer of the police in PAL has a different role than 17 the executive director's role. And when I talk about 18 leadership skills, I'm talking about it in that context. 19 Q. Okay. So you never told her to leave this MOU 20 thing alone, to not concern herself with the MOU? You 21 never told her that in that meeting? 22 A. I don't recall saying anything about that. 23 Q. Can you recall telling her that she could go 24 ahead and, you know, fight, but if she did that then</p>	<p style="text-align: center;">Page 61</p> <p>1 clarifications person to person, woman to woman, to 2 hopefully be able to clarify any misperceptions or, you 3 know, concerns. 4 BY ATTORNEY FITZPATRICK: 5 Q. Okay. Now, you just said woman to woman. When 6 I asked you earlier if you had told Ms. Cintron that you 7 wanted to speak with her woman to woman, you denied 8 saying that and now you just said it. 9 So were you just saying that for me or are you 10 now remembering that you told Ms. Cintron that you were 11 speaking with her woman to woman? 12 THE WITNESS: Could you read back what I said 13 on the first woman to woman? I don't recall saying 14 that. 15 BY ATTORNEY FITZPATRICK: 16 Q. No. 17 A. Well, then I don't -- 18 Q. You just said you -- 19 A. I don't recall saying that. I'm a woman. 20 She's a woman. It was a woman-to-woman dinner. 21 Q. That's not my question. My question is, do you 22 recall telling her that you were meeting with her woman 23 to woman? 24 A. I don't recall what I said yesterday. I don't</p>

<p>1 recall.</p> <p>2 Q. Okay. And aside from your motivations for why</p> <p>3 you were discussing the issues brought up by Ted Quali,</p> <p>4 setting aside those things, can you tell us of any other</p> <p>5 matter related to PAL that didn't -- that you discussed</p> <p>6 with Ms. Cintron on that evening that didn't relate to</p> <p>7 those things -- those complaints from Ted Quali and the</p> <p>8 misperceptions and so forth?</p> <p>9 A. Absolutely. PAL funded a center for PAL where</p> <p>10 we had a police officer from Philly and a police officer</p> <p>11 from Penn police who staffed it. It was called the</p> <p>12 Tucker PAL Center. And I don't recall what location --</p> <p>13 when she first came on it might have been that we had</p> <p>14 just moved it from the Wilson School at 46th and</p> <p>15 Woodland to 4040 Ludlow Street. It was a small center.</p> <p>16 The school closed and we -- we had to move the center.</p> <p>17 So I was very -- you know, obviously, we were</p> <p>18 funding that and one of my police officers was assigned</p> <p>19 there. So I'm sure we talked a lot about -- about the</p> <p>20 model, because there was no other -- there was no other</p> <p>21 joint model like that, and I don't believe there still</p> <p>22 is with PAL and the police department. So I'm sure we</p> <p>23 talked a lot about that as well.</p> <p>24 Q. Okay. So Penn and PAL -- and I may have</p>	<p>Page 64</p> <p>1 Q. So donors who give money to PAL, do they give</p> <p>2 money for specific centers?</p> <p>3 A. Sometimes.</p> <p>4 Q. Okay. And would this Tucker Center be an</p> <p>5 example of that?</p> <p>6 A. The Tucker PAL Center was created -- I don't</p> <p>7 remember what year, but it was endowed by Penn and it</p> <p>8 was named after Past Police Commissioner Kevin Tucker</p> <p>9 and PAL -- I'm sorry, Penn endowed that, so it continues</p> <p>10 to support financially that center.</p> <p>11 Q. Right. So this would be an example of a donor</p> <p>12 earmarking its money for a particular PAL center,</p> <p>13 correct?</p> <p>14 A. I guess that would be correct, yes.</p> <p>15 Q. Okay. And so when that would be done, those</p> <p>16 funds given by that donor, all those funds would go</p> <p>17 toward the programming at that particular PAL center and</p> <p>18 the staffing of that particular PAL center; is that</p> <p>19 correct?</p> <p>20 A. The staffing's separate.</p> <p>21 Q. Okay.</p> <p>22 A. The budget for PAL would have, you know, a line</p> <p>23 for the Tucker PAL Center because there was an</p> <p>24 endowment. Police officers are not part of the budget</p>
<p>1 misunderstood you earlier -- there is some relationship</p> <p>2 between the University of Pennsylvania and the Police</p> <p>3 Athletic League, correct?</p> <p>4 A. In that we have a relationship informing a</p> <p>5 board -- not a board -- a center, you know, paying for</p> <p>6 the center and staffing it with one Penn police officer</p> <p>7 and they staff it with one Philadelphia officer.</p> <p>8 Q. Sure. But -- I'm sorry, Ms. Rush, but you make</p> <p>9 it seem as though PAL was in the business of doing</p> <p>10 something else, like they're -- I mean, that's -- that's</p> <p>11 really the only kind of relationship you could have with</p> <p>12 PAL, isn't it?</p> <p>13 A. I'm sorry. I don't understand your question.</p> <p>14 Q. The Tucker PAL Center, that's a PAL center,</p> <p>15 correct? It's like an actual PAL center; is that right?</p> <p>16 A. Correct.</p> <p>17 Q. And there are approximately 27 or 30 PAL</p> <p>18 centers throughout Philadelphia; is that right?</p> <p>19 A. Correct.</p> <p>20 Q. And that is what PAL is in the business of</p> <p>21 doing, having PAL centers, correct?</p> <p>22 A. Correct.</p> <p>23 ATTORNEY GOLDEN: Objection.</p> <p>24 BY ATTORNEY FITZPATRICK:</p>	<p>Page 65</p> <p>1 for PAL. Police are put there. They're still paid for</p> <p>2 out of the city. Same thing. Penn still paid for all</p> <p>3 the expenses of that officer assigned, so it was really</p> <p>4 just running the center.</p> <p>5 Q. But the -- there's -- is there no civilian</p> <p>6 personnel at the PAL center?</p> <p>7 A. Not all the time, no. Not at times. It's just</p> <p>8 the officers running it.</p> <p>9 Q. Okay. So, in any event, the earmarking of</p> <p>10 funds by donors, how would that impact your PAL centers</p> <p>11 generally?</p> <p>12 In other words, isn't the result that some PAL</p> <p>13 centers are, essentially, poor centers; whereas, other</p> <p>14 centers like the Tucker Center may have, you know, an</p> <p>15 endowment from someone like the University of</p> <p>16 Pennsylvania?</p> <p>17 ATTORNEY GOLDEN: Objection.</p> <p>18 ATTORNEY ULAK: I'll join.</p> <p>19 THE WITNESS: The goal is always to have all</p> <p>20 centers provide the best level of service and care for</p> <p>21 our children of Philadelphia.</p> <p>22 BY ATTORNEY FITZPATRICK:</p> <p>23 Q. Well, service and care is one thing. But there</p> <p>24 is also facilities, there's programming. The way that</p>
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<p>1 PAL is funded through these donors it seems that it 2 lends itself to opportunities for built-in disparagement 3 between the centers. Wouldn't you agree? 4       ATTORNEY GOLDEN: Objection. 5       THE WITNESS: No, I would not agree. 6 BY ATTORNEY FITZPATRICK: 7       Q. Well, the disparities between the centers -- 8 again, the Tucker PAL Center, which we'll use as an 9 example, because I take it that you're pretty -- pretty 10 familiar with the Tucker PAL Center. Is it safe to say 11 that is a well-funded PAL center, wouldn't you agree? 12       ATTORNEY GOLDEN: Objection. 13       THE WITNESS: Well, actually, it doesn't exist 14 at the moment because it lost the home there. 15       I would say that the majority of funds are not 16 pointed at any particular center. They are general fund 17 contributions. And just like that, we at Penn would 18 contribute. I would contribute personally to general 19 funds so that all the centers could be cared for in the 20 best possible way. 21 BY ATTORNEY FITZPATRICK: 22       Q. The funds that would be considered general 23 funds, those are funds that are not earmarked to a 24 particular center, correct?</p>	<p style="text-align: right;">Page 68</p> <p>1       Q. In other words, it's not earmarked. So it's 2 left to the discretion of the board to determine how to 3 spend that money on the administration of PAL across all 4 of its centers, correct? 5       A. Yes, it's -- it's going for all sorts of 6 centers, yes. 7       Q. Right. And in doing so, there are decisions 8 made concerning which centers receive funding for 9 certain programs and for certain facilities' 10 improvements or repairs and which ones don't, correct? 11       A. Yes. 12       Q. Okay. And were you aware of Lieutenant 13 Cintron's challenging PAL's failure to provide funding 14 to make certain repairs -- necessary repairs at the 15 Wissinoming Center? 16       ATTORNEY GOLDEN: Objection. 17       THE WITNESS: I answered this earlier. I was 18 not aware of that. 19 BY ATTORNEY FITZPATRICK: 20       Q. Okay. Well, now. But before I was asking you 21 about the Wissinoming. Now I'm asking about Cintron's 22 efforts. 23       Were you aware of any efforts by Lieutenant 24 Cintron to get PAL -- excuse me -- to get PAL to</p>
<p>1 A. Correct. 2 Q. Thus, general? 3 A. General. 4 Q. And then it would be up to the board to 5 determine how to distribute those funds between its 6 nearly 30 PAL centers, correct? 7 A. Well, the funding doesn't just cover a center. 8 It covers running PAL. It's personnel, civilian 9 personnel, et cetera, the headquarters. 10 So, yeah, I mean, you're running a large 11 organization and are definitely -- you know, our 12 facilities group is looking to make sure, you know, 13 repairs are made, et cetera, et cetera. So, you know, 14 it's an -- it's an ongoing issue to ensure that we have 15 the best facilities in the neighborhoods where the 16 children need it the most. 17 Q. Okay. And beyond facilities, there's also 18 programming, correct? 19 A. Yes. 20 Q. Okay. And going back to my question before 21 that I was simply pointing out that it's the board's 22 responsibility to figure out how to spend that money in 23 the general fund, correct? 24 A. Yeah, that's correct.</p>	<p style="text-align: right;">Page 69</p> <p>1 disburse the funds that it had in a more even-handed 2 manner so that poor children and minority communities 3 would have PAL centers that were just as nice as the PAL 4 centers in majority communities? Do you recall any of 5 that discussion? 6 A. No. 7       ATTORNEY FITZPATRICK: Okay. Can we take a 8 two-minute break here? I think we're just about done, 9 but I'd like to take a quick break. Is that all right? 10       ATTORNEY GOLDEN: Can we take five, that way we 11 can use the restroom? 12       ATTORNEY FITZPATRICK: Yes. 13       (A break was taken 11:38 a.m. to 11:49 a.m.) 14 BY ATTORNEY FITZPATRICK: 15       Q. So, Ms. Rush, I'd like to just cover a couple 16 of other things with you. 17       One is the Tucker PAL Center. Now, how is it 18 that the Tucker PAL Center came to be? 19 A. It was something that the executive vice 20 president at the time, John Fry, worked with my 21 predecessor, Tom Seamon, to -- Tom was a long-time 22 member of PAL, the PAL board -- to honor, you know, 23 Kevin -- Kevin Tucker was -- had left the department as 24 commissioner. And they just decided they wanted to open</p>

<p>1 a center -- be the first to open a center that would be      2 supported by, not only financially, but supported by      3 having a police officer assigned there.      4 And the first -- the first Tucker PAL was at      5 46th and -- I think it was 46th and Woodland, the Wilson      6 School, until it closed. The school closed. Then we      7 moved it over to the Elwyn Institute at an annex at 4040      8 Ludlow. And then that was sold.      9 And so PAL has been trying to find an      10 appropriate home for the Tucker PAL Center. So it's      11 kind of grouped into another center at the moment.      12 Q. Right. But the Tucker PAL Center -- it sounds      13 like that's the University City type area.      14 A. Yeah, but it wasn't -- we don't have -- we      15 wanted to be able to support the kids that lived west of      16 University City and that's why the original PAL center      17 was at 46th and Woodland.      18 PAL looks at centers -- locations to where they      19 can best serve children where there are holes in that      20 service. So that was totally up to PAL to put the      21 center where they wanted it.      22 Q. Okay. All right. Because -- and that's      23 exactly the -- the thrust of my question is that I'm      24 familiar with that area and there aren't a whole bunch</p>	Page 72	<p>1 there when I joined the board, because I joined the      2 board as -- when I was promoted to vice president, and      3 so Tom Seamon left and I ended up taking his position on      4 the board.      5 The Tucker PAL was at 46th and Woodland and      6 happily there until the School District of Philadelphia      7 shut the building down and we were evicted. So we had      8 to find someplace to put the PAL center in a proximity      9 close enough that we could still have the same children      10 coming to the center.      11 Q. Right. I'm just asking, were you on the PAL      12 board when that all happened?      13 A. When -- when the school shut down?      14 Q. Yeah. When you went from 46th and Woodland to      15 4040 Ludlow, were you on the PAL board when that      16 happened?      17 A. Yes, I was.      18 Q. Okay. All right. Were there any other PAL      19 officials on the PAL board when that happened?      20 A. No.      21 Q. Okay. And how long did that PAL center stay      22 open?      23 A. I'd be guessing. I would say a couple years.      24 And then we were notified that the Elwyn Institute was</p>	Page 74
<p>1 of kids over there.      2 A. Exactly. Exactly.      3 Q. Okay. So -- okay. But at any rate, what      4 you're telling us is that this center, the Tucker PAL      5 Center, that was something that was in the works before      6 your participation on the PAL board?      7 A. Correct.      8 Q. All right. But had it been completed prior to      9 your participation on the PAL board?      10 A. No, it had not. I had not been on the board      11 yet, no.      12 Q. Okay. So is it fair to say that this was      13 completed during your participation on the PAL board?      14 A. No. Actually, it was started and in motion at      15 46th and Woodland before I became a member of the PAL      16 board.      17 Q. Okay. So Tucker PAL had already began prior to      18 you being on the PAL board?      19 A. That's correct.      20 Q. It was just at the 46th and Woodland location?      21 A. Correct.      22 Q. And while you were on the PAL board you got it      23 moved to the 4040 Ludlow location?      24 A. I didn't get it moved. I was -- it was still</p>	Page 73	<p>1 leaving and we were able to stay until a developer said      2 that they needed us to move out.      3 Q. Okay. But were they servicing kids at that      4 location?      5 A. Um-hum. Very much so.      6 Actually, there are town homes at 40th and      7 Market and there were a lot of children there that were      8 served. And then we would transport kids who had been      9 over at 46th and Woodland. PAL donated -- I'm sorry.      10 Penn donated a van for PAL marked as PAL and they would      11 transport the kids who were part of the Tucker PAL at      12 46th and Woodland so they would still be part of the      13 center.      14 Q. Were there other PAL centers that bussed the      15 kids to the PAL center?      16 A. Sometimes, yeah.      17 Q. All right. That strikes me as a bit odd for a      18 PAL center, because my understanding is that typically      19 PAL centers, they're kind of like community centers and      20 they draw from the walking -- the walking children      21 within that community.      22 Are you telling me that's not the case?      23 A. That is -- that is the normal case and that is      24 the utopia of what we look for. We want to have</p>	Page 75

<p style="text-align: right;">Page 76</p> <p>1 children have a safe place to do homework, walk in off 2 the street. 3 And sometimes centers get shut down and that 4 has to -- you know, we don't own them. We're leasing as 5 a PAL company and we do the very best we can to get 6 property in the neighborhood where the children need to 7 be served. 8 Q. Okay. On the -- speaking of that and the 9 facilities, at the time -- do you recall that at the 10 time that Lieutenant Cintron comes to PAL there was a 11 four-year backlog of emergency repairs required to be 12 made at various centers? Do you recall that? 13 A. I do not. 14 Q. You don't recall any backlog for repairs or am 15 I just wrong about the number, like, you recall a 16 three-year number and I said four or is it that you 17 don't recall this issue at all? 18 A. I don't recall. 19 Q. You don't recall the issue at all? 20 A. I don't recall. 21 Q. Okay. And so when PAL would pick up children 22 to participate in the PAL program at the PAL center, how 23 does -- how does that -- how does that work? 24 Logistically, how does that work?</p>	<p style="text-align: right;">Page 78</p> <p>1 Q. Well, just so that we're clear -- because I 2 don't want to misunderstand you and I don't want you to 3 mislead me -- there's a difference between special 4 programming like going to Penn Relays or going to a 5 tournament or going to an event. There's a difference 6 between that and the regular Monday through Friday, 7 Monday through Thursday playing basketball at the PAL 8 center. There's a difference between the two. 9 And what I understood you to tell me earlier is 10 that PAL would bus children to participate at the actual 11 PAL center and the regular PAL activities. Is that what 12 you were telling me or were you telling me about bussing 13 for special events? 14 A. Well, first off, we don't bus them. We have 15 very nice 12-person vans. 16 Secondly, not all kids -- when the Wilson 17 School closed, some of the children were absorbed in a 18 closer center to them. Other children would have to 19 come to the current location for Tucker PAL. That was 20 never meant to be a full-time location for the Tucker 21 PAL center. 22 But having no center, having somewhere to take 23 the children and make sure they had a continuity of 24 care and knowledge of the police officers that are</p>
<p style="text-align: right;">Page 77</p> <p>1 A. I don't understand your question. 2 Q. I'm saying that you just told us that in the 3 case of the Tucker PAL Center, and even in the case of 4 some other PAL centers, PAL picks up the children and 5 they bring the children to the PAL center to participate 6 in the program. 7 In a perfect world the children could walk to 8 the PAL center. But you said that in some cases PAL 9 picks up the children and brings them to the PAL center 10 to participate in the program. 11 And what I'm asking you is, logically, how 12 would that work? 13 A. Well, there's -- there's times that the 14 children are transported to -- for example, they were 15 always welcome to Penn Relays. We had -- Penn hosted 16 the citywide PAL Day at the Pulaski for basketball. 17 Q. Okay. 18 A. And PAL centers would take their -- they all 19 had vans and they would transport their kids. So they 20 would all participate equally in the fun. 21 We did the ice rink. There were other events 22 around the city where the kids would be transported. 23 And that wasn't that unusual, actually, and logically 24 it works.</p>	<p style="text-align: right;">Page 79</p> <p>1 almost like their parents, that was a temporary solution 2 to any child who -- we weren't going to have children 3 walking anywhere. Even -- even in the centers that are 4 close, there are issues around children being scared to 5 walk around, especially today. 6 So this was a quick shutdown of a school. We 7 needed to do something for the children. We were able 8 to get a quick rental and we continually to this day try 9 to look for a center where the Tucker PAL can get a 10 permanent home or be together with another center that 11 would be -- that would serve a similar demographic. 12 Q. Okay. I'm afraid that's not responsive to my 13 question. My question is -- I understand that children 14 are bussed to special PAL events; Penn Relays, 15 tournaments, things of that nature. Those are meet at 16 the PAL center -- just so that you know, I was a PAL kid 17 once myself. Meet at the PAL center early in the 18 morning, we get on those nice PAL vans, and you might go 19 someplace, okay? That's different from the regular 20 day-to-day PAL programming, after school, homework, 21 playing basketball. That's different. 22 Are you telling us that children were taken in 23 vans to the PAL center to participate in the regular PAL 24 day-to-day activities?</p>

<p>1 A. So I'm not arguing with you that they're      2 different, number one. What I'm saying to you was the      3 distance between where the Tucker PAL was at 46th and      4 Woodland and where the temporary location was at 4040      5 Ludlow necessitated the officers assigned to the Tucker      6 PAL center to identify students that wanted to still      7 come to be part of the Tucker PAL center, to be part of      8 that officer's cadre, and they transported those      9 students after school who wanted to come and made sure      10 they were transported back safely to their homes. And,      11 again, it's not -- not utopia, but better than having      12 them not have a place to go.</p> <p>13 Q. And my question to you originally was,      14 logically, how would that transportation work? And      15 that's when you started talking about Penn Relays. I'm      16 not talking about Penn Relays. I'm talking about these      17 officers of yours who you say would go get students so      18 that they could continue to participate in the regular      19 PAL program. Logistically, how would that work? Are      20 they picking these kids up at their homes? Are they      21 picking them up at the school? Do they have permission      22 slips from their parents? How does it work?</p> <p>23 A. Well, I'm not that deep into the logistics of      24 that. That is something that the -- the police</p>	<p>Page 80</p> <p>1 me was police officers being able to go into      2 neighborhoods where the PAL center is not located but      3 pick up children and transport them to the PAL center      4 although temporarily, you don't know how that was done      5 logistically? You don't know what your exposure was in      6 terms of insurance, whether there were permission slips?      7 You don't know anything about that; is that what you're      8 telling me?</p> <p>9 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>10 THE WITNESS: I said I am not -- I don't direct      11 the logistics. The commanding officer of PAL would be      12 responsible to work with their officers to make sure the      13 children are safely transported.</p> <p>14 BY ATTORNEY FITZPATRICK:</p> <p>15 Q. Okay. So then would it surprise you that the      16 commanding officer, Lieutenant Cintron, says that that      17 is not something that PAL ever did?</p> <p>18 ATTORNEY GOLDEN: Objection.</p> <p>19 THE WITNESS: I have no idea what she knows or      20 doesn't know.</p> <p>21 BY ATTORNEY FITZPATRICK:</p> <p>22 Q. Well, where did you hear that this was      23 happening? Where do you get your information?</p> <p>24 A. At board meetings.</p>
<p>1 commanding officer of the police officers assigned to      2 PAL would work out.</p> <p>3 Q. In fact, Ms. Rush, you have never seen any      4 student or any child be transported to a PAL center for      5 regular PAL activities, have you?</p> <p>6 ATTORNEY GOLDEN: Objection. Go ahead.</p> <p>7 THE WITNESS: Have I seen or have I --</p> <p>8 BY ATTORNEY FITZPATRICK:</p> <p>9 Q. Yes. Have you seen it? Have you seen it?</p> <p>10 A. I haven't seen it but I have heard of.</p> <p>11 Q. So -- but you've heard -- you've heard of it;      12 is that what you're saying?</p> <p>13 A. Yes.</p> <p>14 Q. But although you've heard of it, you have no      15 idea logically how it works, correct?</p> <p>16 A. I am not the logistical person for      17 transportation of PAL students, correct.</p> <p>18 Q. Right. But you would, obviously, understand      19 that safety and security would be a concern, correct?</p> <p>20 ATTORNEY GOLDEN: Objection.</p> <p>21 THE WITNESS: It's our highest concern.</p> <p>22 BY ATTORNEY FITZPATRICK:</p> <p>23 Q. Okay. And so although safety and security is      24 your highest concern, and what you've just described to</p>	<p>Page 81</p> <p>1 Q. At board meetings.</p> <p>2 So who at a board meeting told you that      3 children were being bussed to the PAL -- not bussed,      4 because you don't like that term, right -- so vanned to      5 the PAL center in the nice vans for their regular PAL      6 activities? Who told you that? Who reported that at a      7 board meeting?</p> <p>8 A. Some centers would be closed for repairs and      9 the children would be grouped with other centers. It      10 wasn't often, but it happened. And who specifically      11 told me that? I have no idea.</p> <p>12 Q. You have no idea because you just made that up,      13 didn't you?</p> <p>14 ATTORNEY GOLDEN: Objection.</p> <p>15 THE WITNESS: I'm insulted by that question. I      16 have a passion for PAL centers.</p> <p>17 BY ATTORNEY FITZPATRICK:</p> <p>18 Q. You don't know who told you. You don't know      19 how it's done, correct? You've never seen it done.</p> <p>20 You said the commanding officer would be      21 responsible for doing it. I just told you the      22 commanding officer says that it's not done and you're      23 insulted by the insinuation that you made that up?</p> <p>24 ATTORNEY GOLDEN: Objection.</p>

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1 THE WITNESS: I have no answer to that other  
 2 than what I've told you five times.

3 BY ATTORNEY FITZPATRICK:

4 Q. Last question. There was -- you said there was  
 5 a meet-and-greet -- this meet-and-greet meeting that you  
 6 had with Lieutenant Cintron, the dinner, but there was  
 7 actually a meet-and-greet with Lieutenant Cintron prior  
 8 to that dinner at your office where you introduced her  
 9 to the staff; isn't that right?

10 A. In my conference room, yes.

11 Q. Okay. So you led us to believe that this  
 12 meeting -- this dinner meeting was a meet-and-greet and  
 13 now you're telling me that you had actually previously  
 14 had a meet-and-greet with her.

15 ATTORNEY GOLDEN: Objection.

16 THE WITNESS: The first meeting was with her  
 17 staff and my staff. It was very high level and it was  
 18 just to introduce her to what our officers do with the  
 19 PAL and with Tucker PAL.

20 The second meeting, the dinner, was a  
 21 one-on-one meet-and-greet, which was very different -- a  
 22 different level of communication at that meeting.

23 BY ATTORNEY FITZPATRICK:

24 Q. You defined it as the first meeting and the

Page 85  
 1 second meeting. But you had numerous opportunities and  
 2 occasions to meet with Ms. Cintron prior to that dinner  
 3 meeting; isn't that right?

4 A. I'm sorry. Did I have an opportunity, are you  
 5 saying?

6 Q. Did you actually meet with her on numerous  
 7 occasions prior to that dinner meeting? At board  
 8 meetings, did you see her at board meetings?

9 A. I saw her. I didn't have conversations with  
 10 her. I didn't sit down and have a meal with her.

11 Q. I know there's only one time that you had a  
 12 meal. I'm simply saying that that wasn't the first time  
 13 that you met her at dinner. That wasn't the first time  
 14 meeting her, correct?

15 A. Correct.

16 Q. Right. And it wasn't the second time meeting  
 17 her because we know that you had the meet-and-greet with  
 18 your office. So you at least had met her on that  
 19 occasion; yes?

20 A. Yes.

21 Q. And you had at least seen her during the  
 22 interview process, correct?

23 A. Yes.

24 Q. And there had been multiple board meetings

1 where you had been in her presence, correct?

2 ATTORNEY GOLDEN: Objection.

3 THE WITNESS: I don't know specifically how  
 4 many board meetings, so I can't say yes or no.

5 BY ATTORNEY FITZPATRICK:

6 Q. Well, you presented this as a meet-and-greet  
 7 that you would do for anyone who is new to a position  
 8 and coming in and taking over a position. That --  
 9 that's how you described this meeting -- this dinner  
 10 meeting with Lieutenant Cintron, correct?

11 A. And I still stand by that.

12 Q. Okay. And I'm simply pointing out that this  
 13 wasn't her first week on the job that you had this  
 14 dinner meeting with her for a meet-and-greet, was it?

15 A. Correct.

16 Q. Right. She was -- she was well into her time  
 17 there; is that correct?

18 A. She was still --

19 ATTORNEY GOLDEN: Objection.

20 THE WITNESS: She was still early in her time  
 21 there.

22 BY ATTORNEY FITZPATRICK:

23 Q. Define early.

24 A. I don't know. I don't even know when she

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1 started and I don't even know when the dinner was, but  
 2 it felt early with me.

3 And perhaps the word meet-and-greet is what's  
 4 confusing to you. Because to me, meet-and-greet is  
 5 where you can really get down and talk to people as  
 6 opposed to meeting people at board meetings, meeting  
 7 people in meetings, corporate meetings. There's that  
 8 and then there's a one-on-one dinner.

9 So I apologize if my designation of this was a  
 10 meet-and-greet as opposed to let's have dinner and get  
 11 to know each other better.

12 Q. You -- that dinner was a woman-to-woman  
 13 meeting, that's what that dinner was, isn't it? That's  
 14 what that dinner was?

15 A. That dinner was a person-to-person meeting who  
 16 happened to be two women who had some shared experiences  
 17 in life.

18 ATTORNEY FITZPATRICK: Okay. Thank you so  
 19 much, Ms. Rush. I don't have any other questions for  
 20 you at this time.

21 Mr. Golden might have some questions.

22 ATTORNEY GOLDEN: Sharon, do you have any  
 23 questions?

24 ATTORNEY ULAK: Yeah, I actually do have a

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1 couple of questions. I actually really only have one  
2 though.

## 3 EXAMINATION

4 BY ATTORNEY ULAK:

5 Q. Ms. Rush --

6 ATTORNEY ULAK: Well, maybe it's a couple of  
7 questions. I'm sorry.

8 BY ATTORNEY ULAK:

9 Q. Ms. Rush, I want to go back to this dinner  
10 that's been the subject of so much debate today. Do you  
11 recall approximately what -- like, do you recall the  
12 year in which this dinner occurred?13 A. I've got to tell you, no. I mean, it was -- it  
14 was the year she was first on board, whatever year that  
15 was.16 Q. Okay. Do you happen to recall who the deputy  
17 commissioner who would have been overseeing PAL was at  
18 the time of the dinner?

19 A. I believe -- I believe it was Joe Sullivan.

20 ATTORNEY ULAK: Okay. Thank you.

21 ATTORNEY GOLDEN: No questions on my part.

22 ATTORNEY FITZPATRICK: Okay. Thank you very  
23 much. That's all I have.

24 \* \* \* \*

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1 ATTORNEY GOLDEN: Ms. Miller, can we order a  
2 copy? It's kgolden, g-o-l-d-e-n, at ohagenmayer.com.

3 You know what, send me an e-mail and just reach  
4 out to me and let me think about that and then I'll  
5 confirm my answer once I have some time to think about  
6 it.

7 ATTORNEY ULAK: Ms. Miller, I also would like  
8 to request a copy of the transcript. I want full only,  
9 electronically. My e-mail address is Sharon,  
10 s-h-a-r-o-n, dot, ulak@phila.gov.

11 ATTORNEY FITZPATRICK: I will need before  
12 Thanksgiving. Full size at -- you have my e-mail  
13 already.

14 \* \* \* \*

15 (Deposition concluded)

16

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24

1 COUNTY OF LANCASTER :  
2 COMMONWEALTH OF PENNSYLVANIA:  
3  
4

I, Lisa L. Miller, RPR, a Notary Public of  
the Commonwealth of Pennsylvania, County of Lancaster,  
do hereby certify that the foregoing was taken  
stenographically by me on November 3, 2023, and that  
this transcript is a true and correct transcript of the  
same, fully transcribed under my direction, to the best  
of my ability and skill.

I further certify that I am not a relative  
or employee of any of the parties in this action; that I  
am not a relative or employee of any attorney in this  
action; and that I am not financially interested in the  
event of this action.

As witness my hand and Notarial Seal this  
17th day of November 2023.

18  
19 Lisa L. Miller, Notary Public  
20  
21 Notary Public in and for the  
Commonwealth of Pennsylvania

22 My Commission expires: 6/26/2024  
23  
24

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<b>19103</b> (2)	ability (2)	<b>Approximately</b> (3)	<b>break</b> (6)
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<b>215.683.5083</b> (1)	addressing (2)	assure (1)	<b>business</b> (2)
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<b>25th</b> (6)	advice (6)	Athletic (10)	<b>bussing</b> (1)
<b>26</b> (1)	advise (1)	attached (1)	<C>
<b>27</b> (2)	advised (1)	attempting (2)	<b>cadre</b> (1)
<3>	advisor (1)	Attorney (95)	<b>calendar</b> (2)
<b>3</b> (2)	affiliation (1)	attributed (1)	<b>calendars</b> (1)
<b>30</b> (2)	affirmative (1)	aware (27)	<b>call</b> (4)
<b>34</b> (1)	affirmed (1)	<B>	<b>called</b> (3)
<b>3402</b> (1)	afraid (1)	back (13)	<b>calls</b> (1)
<b>3600</b> (1)	agenda (5)	backlog (2)	<b>capital</b> (1)
<b>3910</b> (1)	ago (2)	bad (1)	<b>captain</b> (2)
<4>	agree (5)	basic (4)	<b>care</b> (3)
<b>4</b> (1)	ahead (17)	basically (3)	<b>cared</b> (1)
<b>4040</b> (5)	al (1)	basing (1)	<b>career</b> (2)
<b>40th</b> (1)	allotment (1)	basis (5)	<b>Carnaroli</b> (1)
		basketball (3)	<b>C-a-r-n-a-r-o-l-i</b> (1)
		becoming (2)	<b>case</b> (10)
		began (2)	<b>cases</b> (1)
		believe (20)	<b>center</b> (71)

centers (37)	<b>COMMONWEALTH</b>	course (4)	developer (1)
certain (3)	(3)	<b>COURT</b> (1)	development (1)
certainly (3)	<b>communicate</b> (9)	courtesy (2)	difference (7)
certification (1)	<b>communicated</b> (1)	cover (2)	differences (1)
certify (2)	<b>communicates</b> (1)	covered (2)	different (16)
cetera (3)	<b>communicating</b> (4)	covers (1)	difficult (1)
chain (6)	<b>communication</b> (10)	<b>Craig</b> (1)	dinner (48)
chair (11)	<b>communications</b> (3)	created (1)	direct (4)
challenging (1)	<b>communities</b> (2)	creative (1)	direction (4)
change (1)	<b>community</b> (5)	crux (1)	directly (6)
changed (3)	<b>company</b> (1)	current (2)	<b>Director</b> (58)
changes (1)	<b>complained</b> (1)	currently (2)	directors (6)
changing (1)	<b>complaints</b> (1)	< D >	director's (2)
Chief (6)	<b>completed</b> (2)	daily (4)	disavowed (1)
child (2)	<b>completely</b> (1)	<b>Danielle</b> (1)	disburse (1)
children (31)	<b>concept</b> (1)	Date (2)	discipline (1)
Christmas (1)	<b>concern</b> (4)	day (7)	discretion (1)
<b>CINTRON</b> (63)	<b>concerning</b> (2)	<b>day-to-day</b> (2)	discuss (8)
Cintron's (4)	<b>concerns</b> (2)	Dean (1)	discussed (5)
<b>CITY</b> (9)	<b>concluded</b> (1)	debate (1)	discussing (4)
citywide (1)	<b>condition</b> (5)	decent (1)	discussion (3)
Civil (1)	<b>conditions</b> (1)	decided (1)	discussions (1)
civilian (7)	<b>conference</b> (2)	decisions (1)	disparagement (1)
clarifications (1)	<b>confirm</b> (1)	deep (1)	disparities (1)
clarify (1)	<b>confused</b> (1)	deeper (1)	distance (1)
clarifying (1)	<b>confusing</b> (1)	<b>Defendants</b> (1)	distinction (2)
clear (7)	<b>considered</b> (1)	define (4)	distribute (1)
clearly (1)	<b>consistent</b> (1)	defined (4)	<b>DISTRICT</b> (16)
close (2)	<b>contemporaneous</b> (1)	defining (1)	districts (1)
closed (8)	<b>context</b> (1)	definitely (2)	diversified (1)
closely (3)	<b>continuity</b> (1)	degree (1)	division (1)
closer (1)	<b>continually</b> (1)	<b>demographic</b> (1)	dog (2)
clue (1)	<b>continue</b> (2)	denied (1)	doing (8)
coincidence (1)	<b>continues</b> (1)	<b>Department</b> (25)	dominated (1)
collaboration (1)	<b>contribute</b> (2)	depending (1)	donated (2)
collaborative (1)	<b>contributions</b> (1)	depends (1)	donor (2)
come (13)	<b>control</b> (1)	deposed (2)	donors (3)
comes (1)	<b>conversation</b> (13)	<b>Deposition</b> (5)	dot (1)
coming (8)	<b>conversations</b> (5)	Deputy (8)	draw (1)
command (5)	<b>conversation's</b> (1)	derive (1)	due (1)
commander (14)	<b>convoluted</b> (1)	described (3)	duly (1)
commanders (1)	<b>cooperatively</b> (2)	describing (2)	duties (13)
commanding (40)	<b>copy</b> (2)	descriptions (1)	duty (2)
Commission (1)	<b>corporate</b> (1)	designated (1)	< E >
commissioner (14)	<b>correct</b> (103)	designation (1)	earlier (9)
commissioner's (1)	<b>corroborate</b> (1)	despite (2)	early (5)
committee (29)	<b>counsel</b> (1)	detail (3)	<b>earmarked</b> (2)
committees (5)	<b>COUNTY</b> (2)	determine (2)	earmarking (2)
common (1)	<b>couple</b> (4)		

EASTERN (1)	explain (5)	four (3)	< H >
eat (1)	explained (3)	four-year (1)	hand (5)
effort (1)	explaining (1)	friction (8)	handle (1)
efforts (3)	exposure (1)	Friday (2)	happen (2)
either (1)	extend (1)	front (3)	happened (7)
electronically (1)	extent (2)	frustrations (1)	happening (3)
Elwyn (2)	< F >	Fry (1)	happens (1)
e-mail (4)	facilities (6)	fulfilling (1)	happily (1)
emergency (1)	fact (5)	full (6)	happy (2)
employed (1)	failure (1)	full-time (1)	hard (1)
employee (2)	fair (1)	fully (2)	headquarters (1)
employees (3)	fall (2)	fun (1)	hear (1)
Employment (2)	falling (1)	fund (2)	heard (7)
encounter (1)	familiar (6)	funded (2)	held (1)
ended (1)	far (1)	funding (4)	help (7)
endowed (2)	Faust (2)	funds (10)	helped (1)
endowment (2)	F-a-u-s-t (1)	further (1)	helpful (5)
enforcement (3)	feedback (2)	< G >	helping (2)
enjoy (2)	feeling (2)	gala (1)	high (1)
ensure (6)	fellow (4)	gender (1)	higher (1)
environment (1)	felt (3)	general (12)	highest (2)
equally (1)	female (6)	generally (3)	hired (1)
escaping (1)	Fifteen (1)	getting (1)	hiring (3)
especially (4)	fight (1)	give (11)	history (4)
Esquire (5)	figure (1)	given (5)	hoc (1)
essentially (2)	filng (1)	giving (2)	hold (2)
et (4)	Finance (11)	go (32)	holes (1)
EVELYN (5)	financial (2)	goal (1)	home (3)
even-handed (1)	financially (3)	goes (1)	homes (3)
evening (4)	financing (1)	going (16)	homework (2)
event (3)	find (2)	GOLDEN (40)	honestly (1)
events (5)	fine (1)	g-o-l-d-e-n (1)	honor (1)
evicted (1)	first (22)	Good (5)	hopefully (1)
evolved (2)	Fitzpatrick (48)	gotten (1)	hosted (1)
exact (2)	five (3)	graduated (1)	hypothetical (3)
exactly (5)	Floor (1)	great (6)	Hypotheticals (1)
Examination (4)	flow (2)	GREEN (2)	< I >
examined (1)	follows (1)	grievances (1)	ice (1)
example (4)	foot (1)	ground (1)	idea (10)
excuse (1)	foregoing (1)	group (1)	ideas (1)
executive (92)	forgive (1)	grouped (2)	identify (1)
EXHIBITS (1)	form (1)	groups (1)	impact (4)
exist (1)	formally (1)	grow (1)	impression (2)
expect (1)	forming (1)	guess (5)	improvements (1)
expected (1)	forth (1)	guessing (1)	include (3)
expenses (1)	forthcoming (2)	Guidance (5)	including (1)
experience (9)	forward (1)	guide (1)	INDEX (2)
experiences (1)	found (1)		individuals (4)
expires (1)			

inform (1)	kgolden@ohaganmaye	long (2)	misperception (1)
informally (1)	r.com (1)	longer (1)	misperceptions (16)
information (12)	kid (1)	long-term (1)	mission (4)
informing (1)	kids (12)	long-time (3)	misunderstand (2)
Inn (4)	kind (16)	look (2)	misunderstood (1)
inside (2)	kinds (2)	looking (1)	mixture (1)
insinuation (1)	knew (4)	looks (1)	model (4)
Institute (2)	know (86)	lost (1)	moment (4)
insult (1)	knowing (1)	lot (13)	Monday (2)
insulted (2)	knowledge (6)	Ludlow (5)	money (8)
insurance (1)	knows (1)	lunch (3)	month (1)
intend (2)	< L >	< M >	monthly (9)
intending (2)	Labor (1)	ma'am (1)	months (1)
intention (2)	LANCASTER (2)	maintenance (6)	morning (4)
interacted (1)	large (1)	majority (2)	motion (1)
interacting (1)	Law (4)	making (3)	motivations (1)
interaction (2)	leader (2)	male (4)	MOU (6)
interactions (2)	leadership (17)	man (1)	mouth (1)
interested (2)	leading (1)	manner (1)	move (3)
interesting (1)	League (12)	marked (1)	moved (4)
Interim (1)	leasing (1)	Market (2)	multi (1)
interview (3)	leave (1)	matter (1)	multiple (1)
interviewed (1)	leaving (2)	matters (1)	< N >
introduce (2)	led (1)	Maureen (4)	name (5)
introduced (1)	left (4)	MAYER (1)	named (1)
invitation (1)	lends (1)	meal (3)	name's (1)
invited (3)	level (5)	mean (8)	nature (2)
involved (10)	liaison (1)	meant (2)	nearly (1)
involvement (1)	lialson (1)	meet (11)	necessarily (2)
ISAAC (2)	Lieutenant (64)	meet-and-greet (29)	necessary (1)
issue (8)	lieutenant's (1)	Meet-and-greets (1)	necessitated (1)
issues (14)	life (2)	meeting (63)	need (8)
item (2)	limit (1)	meetings (34)	needed (7)
items (3)	line (7)	member (21)	needs (1)
its (3)	Lisa (4)	members (9)	neighborhood (1)
< J >	list (1)	Memorandum (13)	neighborhoods (2)
job (4)	listing (1)	men (7)	never (13)
jobs (1)	litigation (2)	mention (2)	new (16)
Joe (1)	little (3)	message (1)	nice (5)
John (1)	lived (1)	met (8)	Nisenbaum (2)
join (2)	LLC (1)	midterm (1)	Nomination (2)
joined (3)	located (1)	Mike@barrettdeangel	nominations (5)
joint (1)	location (7)	o.com (1)	normal (1)
< K >	locations (1)	Miller (5)	Notarial (1)
KEVIN (4)	logistical (1)	MINCEY (1)	Notary (3)
key (2)	Logistically (7)	mind (1)	not-for-profit (4)
kgolden (1)	logistics (2)	minority (1)	notified (1)
	logo (1)	mislead (1)	November (3)

number (6)	overlapped (1)	Plaintiff (2)	provided (1)
numerous (4)	oversaw (1)	planning (2)	providing (2)
< O >	oversee (1)	play (1)	provision (1)
objected (1)	overseeing (1)	playing (2)	proximity (1)
Objection (35)	oversees (1)	please (1)	Public (10)
objections (1)	< P >	plowed (1)	Pulaski (1)
obviously (4)	Page (1)	point (11)	purpose (5)
occasion (1)	paid (2)	pointed (3)	put (5)
occasions (2)	PAL (191)	pointing (3)	< Q >
occur (1)	PAL's (1)	Police (96)	Quali (19)
occurred (3)	pamphlet (2)	poor (4)	Quali's (1)
odd (1)	parents (2)	position (21)	quarterly (1)
offer (2)	part (16)	positions (4)	question (35)
office (3)	participate (7)	possible (1)	questions (6)
officer (50)	participated (1)	Possibly (1)	quick (3)
officers (22)	participation (3)	practice (2)	quite (5)
officer's (1)	particular (7)	Prazenica (4)	< R >
offices (1)	parties (3)	preceded (1)	Rabena (6)
officially (1)	partnership (2)	predecessor (1)	Rabena's (1)
officials (2)	passion (1)	predominantly (4)	race (1)
O'HAGAN (1)	patrol (2)	presence (1)	raise (3)
ohagenmayer.com (1)	paying (1)	present (3)	rank (2)
Okay (174)	pending (3)	presented (3)	ranks (2)
old (1)	Penn (29)	President (17)	rate (2)
onboard (2)	Penne (1)	pretty (4)	reach (2)
onboarding (1)	P-e-n-n-e (1)	preventative (3)	read (2)
once (6)	PENNSYLVANIA (16)	previous (5)	real (1)
one-on-one (3)	people (22)	previously (2)	realize (1)
ones (2)	perfect (1)	prior (19)	really (14)
ongoing (1)	performance (1)	private (1)	recall (91)
open (3)	performed (2)	privy (1)	receive (2)
operates (2)	peripheral (2)	probably (5)	received (3)
operating (1)	peripherally (1)	problem (1)	recollection (3)
operation (1)	permanent (1)	problems (1)	recorded (1)
opportunities (2)	permission (2)	procedure (1)	referring (3)
opportunity (6)	person (9)	proceed (1)	regarding (15)
opposed (2)	personally (1)	process (1)	Regardless (1)
order (1)	personnel (5)	program (4)	regular (7)
orders (1)	person-to-person (1)	programming (10)	re-invigorated (1)
organization (3)	PHILADELPHIA (28)	programs (1)	relate (1)
organizations (1)	Philly (2)	promised (1)	related (11)
original (2)	phone (2)	promoted (3)	relates (1)
originally (1)	pick (2)	promotion (1)	relationship (5)
outline (3)	picking (2)	promotions (1)	relative (2)
outlined (2)	picks (2)	proof (1)	relatively (2)
outlining (1)	place (10)	property (1)	Relays (5)
overbudget (1)		proponents (1)	remained (3)
overlap (1)		proud (1)	
		provide (4)	

remember (9)	Safety (10)	simpler (1)	strategy (1)
remembering (1)	Samson (1)	simply (9)	Street (7)
rental (1)	saw (1)	simultaneous (1)	strikes (1)
repair (3)	saying (23)	sit (6)	structure (2)
repaired (1)	says (3)	sits (1)	student (1)
repairs (8)	scared (1)	sitting (2)	students (5)
rephrase (1)	scenes (1)	size (1)	stuff (1)
report (6)	School (11)	skill (1)	style (2)
reported (2)	Seal (1)	skills (8)	subject (1)
Reporter (1)	sealing (1)	slips (2)	subsequently (2)
reporting (1)	Seamon (3)	small (1)	substandard (1)
reports (4)	S-e-a-m-o-n (1)	sold (1)	succeed (4)
represent (1)	seat (1)	Solicitor (1)	successful (4)
representative (1)	second (3)	solution (1)	Suite (2)
representatives (1)	Secondly (1)	solvency (1)	Sullivan (2)
request (1)	secretary (3)	somebody (1)	Support (4)
requested (2)	security (3)	someplace (2)	supported (2)
required (1)	see (5)	somewhat (1)	supportive (1)
reserved (1)	seeing (2)	sorry (18)	supposed (1)
respective (1)	seen (7)	sorts (1)	sure (25)
responsibilities (6)	send (1)	sounds (2)	surprise (4)
responsibility (4)	senior (3)	speak (2)	switched (1)
responsible (10)	separate (1)	speaking (4)	sworn (2)
responsive (1)	separation (1)	Special (4)	Sylvia (3)
rest (2)	sequence (1)	specific (7)	< T >
restaurant (2)	sergeant (1)	specifically (14)	take (16)
restroom (1)	sergeants (1)	specifics (1)	Taken (5)
result (2)	serve (3)	spend (2)	talk (10)
retire (1)	served (3)	spoke (5)	talked (9)
retired (5)	service (4)	SS (1)	talking (14)
retirement (1)	Services (1)	staff (7)	tandem (1)
right (49)	servicing (1)	staffed (1)	team (6)
rink (1)	serving (1)	staffing (2)	Ted (23)
Rob (8)	set (5)	staffing's (1)	tell (15)
role (32)	setting (1)	stance (1)	telling (35)
roles (26)	shared (2)	stand (1)	tells (1)
roll (1)	SHARON (3)	stand-alone (1)	temporarily (1)
Ron (8)	s-h-a-r-o-n (1)	standard (4)	temporary (2)
room (2)	sharon.ulak@phila.go	start (1)	tenure (1)
ROSS (1)	v (1)	started (10)	term (2)
RPR (2)	shift (1)	STATES (1)	terms (3)
rules (1)	shortly (1)	statistics (1)	testified (1)
run (1)	shut (3)	stay (2)	testimony (4)
running (6)	shutdown (1)	stenographically (1)	Thank (5)
Rush (25)	sic (7)	stepped (1)	Thanksgiving (1)
< S >	side (3)	stipulated (1)	thing (7)
safe (7)	sides (1)	STIPULATION (1)	things (17)
safely (2)	signing (1)	straighten (1)	think (15)
	similar (2)	strategic (2)	

Thomas (3)	unaware (1)	woman (19)
thought (4)	understand (14)	woman-to-woman (2)
three (1)	understanding (14)	women (10)
three-year (1)	understood (2)	Woodland (10)
thrust (1)	unique (3)	word (2)
Thursday (1)	Unit (3)	words (3)
time (33)	UNITED (1)	work (19)
times (9)	University (11)	worked (8)
timing (2)	unusual (1)	working (12)
today (7)	use (3)	works (3)
told (25)	utopia (2)	world (3)
Tom (4)	< V >	written (1)
tons (2)	van (1)	wrong (1)
top (2)	vanned (1)	< Y >
total (1)	vans (5)	Yeah (10)
totally (2)	various (5)	year (10)
tournament (1)	verbally (1)	years (9)
tournaments (1)	versus (4)	yesterday (1)
town (1)	Vice (10)	young (1)
trailblazer (1)	Victim (1)	< Z >
trailblazing (1)	video (1)	Zoom (1)
transcribed (1)	Videoconference (1)	
transcript (3)	volunteer (1)	
transferred (1)	vote (2)	
transport (4)	VP (2)	
transportation (2)	vs (1)	
transported (6)	< W >	
treasurer (2)	waived (1)	
treat (1)	walk (3)	
trial (1)	walking (4)	
tried (2)	want (10)	
true (1)	wanted (22)	
truncate (1)	watching (1)	
Trustees (1)	way (13)	
try (4)	ways (3)	
trying (7)	week (1)	
Tucker (27)	welcome (3)	
turn (1)	Well (60)	
tutoring (1)	well-funded (1)	
twice (1)	went (5)	
two (7)	we're (10)	
two-minute (1)	west (1)	
type (2)	we've (1)	
typically (1)	Wilson (3)	
< U >	Wissinomong (5)	
ULAK (12)	witness (34)	
ulak@phila.gov (1)	WITNESSES (1)	
Um-hum (1)		